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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT ILLINOIS

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THOMAS G BRUTON  
CLERK, U S DISTRICT COURT

LETRA BLED SOE

Plaintiff(s),

VS.

Illinois Department of Human Services,  
et al; Office of Executive Inspector

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General for the Agencies of the  
Illinois Governor (OEIG)

Defendant(s).

Case No.:

**1:16-cv-08592**

**Judge Robert W. Gettleman**  
**Magistrate Judge M. David Weisman**

## COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

NOW COMES the Plaintiff, LETRA BLEDSOE, by and through Pro Se, and for her  
Complaint against Defendant(s), ILLINOIS DEPARTMENT OF HUMAN SERVICES, et al.,  
states as follows:

1. At all times relevant hereto, Plaintiff LETRA BLEDSOE, was both a disability customer of IDHS/DRS (Division of Rehabilitation Services) and employee of IDHS in Illinois.

2. At all times relevant hereto, the Defendant(s) IDHS, was a Department/Office of agencies of the Illinois Governor and doing business for State of Illinois.

3. On or about March 16, 2015 and continued through approximately July 12, 2015 and as continuing, Defendant(s) was a Department/Office of agencies of the Illinois Governor and doing business for State of Illinois governed under, by, and through State and Federal, Code, Regulations, Statutes, Rules, Policies, Procedures, and Laws including, but not limited to, Rehabilitation Act of 1973 (and as amended) and EEO/AA. 29 U.S.C. § 701 et seq.

4. On or about and/or beginning approximately in year 2013, Defendant(s) along with State of Illinois and Illinois Central Management Services (CMS), became completely aware that Plaintiff/I am an IDHS/DRS Disability Customer by and through Plaintiff/my Testing/Examining for Open Titles with CMS by and through CMS SDO (Successful Disabilities Opportunities), which is governed by/under **29 U.S.C. § 701 et al., et seq.**, Rehabilitation Act. CMS SDO customers, by State Statute, Rule, Policy, or Law must be referred through IDHS/DRS as a customer (signed 'contract') and must obtain/present "Certificates for Titles" to CMS SDO ('contractual documents,' SDO customer) in order to/before Testing/Examining and/or receiving any other CMS SDO Services. In order to gain employment with State of Illinois, one must Test/Exam with and/or must present credentials to CMS and/or CMS SDO. I/Plaintiff has been an IDHS/DRS Disability Customer since prior to year 2013. Defendant(s) use 'DEFLECTION/non-discriminatory reasons' to DETRACT from Liability/this fact and Defendant(s) knowledge/prior thereof amongst Defendant(s) liability of/for breaches in Federal Law against Disability Discrimination. Defendant(s) also use deflection to detract from the fact that Defendant(s) is liable for unlawful Retaliation amongst Deceitful Practices, Negligence and Negligence per se (U.S.C., ILCS), Breach of Contracts: Defendant(s) IDHS/employment; disability services—DHS/DRS, CMS SDO; Breach/derelection of Duty/care, Tortious Interference, amongst others. Plaintiff presented evidence of proof of disability and disability services with Defendant(s) IDHS/DRS to IDHR/EEOC by and through IDHR/EEOC "medical/disability?" confirmation document. Defendant(s) IDHS/DRS returned the completed, signed, and dated document to IDHR/EEOC. EEOC took jurisdiction of the Charges upon my request (12-2015/01-2016). On or about June 2, 2016, within the highly stressful EEOC

“investigation, EEOC disputed in attempt to refute the document/Plaintiff disability and services as a customer with Defendant(s) IDHS/DRS. Plaintiff/I have proof/evidence.

**Elements of Tortious Interference**

Illinois courts typically require five elements to be proven to sustain a verdict for tortious interference of contract. They are as follows:

- There must be a valid and enforceable contract between the plaintiff and another party; (IDHS—employment/Union, DHS/DRS—customer, CMS SDO—customer)
- The party alleged to have interfered must have knowledge of the contract; (proven above= CMS SDO through DHS/DRS)
- The defendant must have intentionally and unjustifiably induced breach of the contract; (Defendant(s) DHS BCA, OEIG (plus IDHR, EEOC) Malicious and Reckless Disregard, Negligence Per Se, Cahoots and Conspire to DEFRAUD Protected Class Disabled U. S. Citizen/Illinois Citizen and tax-payer and to PROTECT Defendant(s))
- The subsequent breach of the contract must have been caused by the defendant's actions; and (proven by ILCS, U.S.C., IL Rules of Evidence; Preponderance of Evidence; Rule 401. Relevant Evidence, amongst others)
- The plaintiff must have suffered damages. (Plaintiff/I have/am suffered SEVERE DURESS, DISTRESS, ANXIETY, STRESS, and ANGUISH, loss of sleep and ailments to the body on top of loss of employment, loss of wages, embarrassment of unemployment, loss of housing/homeless, among others).

5. In or around year 2014 and continuing, Defendant(s), by and through IDHS Bureau of Recruitment, definitely became fully aware of Plaintiff/my status with Defendant(s) IDHS/DRS by and through having received Referrals from CMS and CMS SDO for opportunities for Plaintiff/me to interview for Titles with Defendant(s). Defendant(s) – IDHS Recruitment Supervisor, Ms. Sherry Jackson – breached State Employee Ethics Act, State laws, Federal laws—EEO/AA, particularly pertaining/relevant to Recruitment, Procedures, etc. by and through Unlawful Recruitment (more than once; see AFSCME Grievance 06-05-15 and amended plus elsewhere in docs supplied to IDHR/EEOD). In or around December 2013/January 2014 Defendant(s), IDHS Recruitment, Ms. Sherry Jackson interviewed and hired (made job offer) Plaintiff/me for a full-time Open Title/position with Defendant(s) DHS/DDD. Plaintiff/I declined/turned down the position (see AFSCME Grievance 06-05-15) upon learning what had not been disclosed (likely intentionally), by Defendant(s), Ms. Jackson, within interview, which is exact area/region/location of Defendant(s) Open Title. Plaintiff/I discovered that the Open Title/position for Defendant(s) was/is approximately 60 miles with 3 to 5 highways and toll ways

each way/direction (depending on route) from Plaintiff/my house/region. In or around December 2014/January 2015, Defendant(s), Ms. Jackson, interviewed Plaintiff/me for the exact same Defendant(s) position location/area; however, this time for a part-time Title/position. Once again, Defendant(s), Ms. Jackson, FAILED (most likely very intentionally) to disclose, within interview to interviewee/Plaintiff, me, that the Open Title is for a position at Defendant(s) DHS/DDD and then state the said location to provided the person being interviewed, Plaintiff/me, with an opportunity for DISCOVERY and information and to make an informed decision about where interviewee/Plaintiff is to be placed and whether or not/if that is satisfactory to interviewee/Plaintiff. Defendant(s) stole Plaintiff/my Right to FREEDOM OF CHOICE/FREE WILL a.k.a. First Amendment. Defendant(s), Ms. Jackson, recalled me and she/Defendant(s) had documented, within Defendant(s)/her records/files, that Plaintiff/I'd interviewed with Defendant(s)/her previously. Defendant(s), Ms. Jackson, also had knowledge that Plaintiff/I had also previously rejected that very same Defendant(s) location (then different Title and status/F-T). Defendant(s) willfully and intentionally, with Negligence and Reckless Disregard, omitted pertinent/relevant information—Deceitful Hiring Practices to deceitfully lure/trick/force Plaintiff/me into employment at an unwanted location and that of a P-T position. Why? Because, as I have discovered is, that said particular Defendant(s) location is very difficult to staff. Defendant(s), Ms. Jackson, within interview, failed (likely intentionally and as discovered from/by communication with Defendant(s) H. R. Rep., Ms. Alice Chambers, who refutes Ms. Jackson's assertion) to LAWFULLY DISCLOSE that the Title/Position for which Plaintiff/I was in Recruitment is (remains) a Part-Time, "Midnight"/Overnight 6:00 p.m. – 6:00 a.m., Weekend (only) Shift. Defendant(s) H. R. Representative, Ms. Alice Chambers, who'd provided Plaintiff/my "on-boarding," refutes Ms. Jackson assertion that she/Defendant(s) "Did

not know that the position is P-T, and that she'd only just learn so upon her call to "Offer" to me/Plaintiff. Ms. Chambers asserts that, "She'd/they'd (DHS/DDD) told her (Ms. Jackson) prior to interview and that she knew." Defendant(s) exercised Deceitful Hiring Practices toward Recruitment of a disabled citizen, particularly a known (to be by Defendant(s)) disabled customer of Defendant(s) DHS/DRS as well as IL CMS SDO by which/from where Defendant(s) Recruit. Why? Because as Plaintiff/I have discovered by evidence of Defendant(s) own unlawful actions (recruit same individual more than once for location previously rejected) as well by discovery of information along with other personal life experiences – proof/evidence – is that employers/Defendant(s), among others, will, typically, ONLY hire disabled citizens for lesser-paying, lower-ranking, menial, out-of-the-way/sight positions regardless of the individuals'/disabled recruits skills, job experience/knowledge, and education on top of Malicious and Reckless Disregard of laws, including EEO/AA in/for Recruitment, etc. Defendant(s), Ms. Jackson, is very-well aware of Defendant(s) and/or State of Illinois Rule, Policy, etc. being that persons/interviewees for Open Titles can ONLY reject no more than three positions/Titles (offers of employment) lest they be REMOVED from the List (interview list). Plaintiff/I was hired by/accepted employment of Defendant(s) IDHS under EXTREME MANIPULATIVE DURESS (on or about 03-09-2015 as documented, Start Date 03-16-15) due to Deceitful Practices/Unlawful Hiring Practices of/by Defendant(s)—AFSCME Grievance 06-05-15 and amended and provided to IDHR/EEOC, OEIG, DHS BCA. Plaintiff/I "Reasonably Opposed" unlawful act/action with/to Defendant(s), particularly OEIG and IDHS BCA (Bureau of Civil Affairs). OEIG did not investigate. IDHS BCA did not investigate. IDHR/EEOC did not investigate.

Relevant: Previously, in or around 01/2015 – 03/2015, and prior to Plaintiff/my State of Illinois employment/Defendant(s), Plaintiff/I had a very similar/relevant experience with CMS SDO whereby CMS SDO Examiners, etc., Ms. Jaci DeBrun, Ms. Holly Guppy, and Supervisor, Ms. Darci Hammers all breached **29 U.S.C. § 701 et al., et seq.** and likely ADA pursuant to the role of CMS SDO and my/Plaintiff being a disability customer of CMS SDO pursuant to State of Illinois Statutes/Laws. CMS SDO proceeded to DEFRAUD Plaintiff/me by DEFRAUDING/cheating Plaintiff/me out of highly-earned Exam Grade “A” for the document Exam by education, experience, etc. rather than Testing for the highest-ranking Illinois Administrative Title being Administrative Assistant II being a Title for which Plaintiff/I “Passed” with Grade A in the previous year. Yet, CMS SDO (all named above) attempted Disability/Rehabilitation Discrimination on top of DEFRAUDING/FRAUD of CMS SDO Disability Customer/Plaintiff by and through Negligence, Negligence Per Se, Malicious and Reckless Disregard, etc. by issuing/having issued to Plaintiff/me a Grade F/SF for the Administrative Assistant II Title despite and with Negligence and Malicious and Reckless Disregard of laws of the pursuant Rehabilitation regarding Disability Services, including Examining/Testing and Grades, of/by/through CMS SDO. CMS SDO also, and with WILLFUL INTENT/NEGLIGENCE among Malicious and Reckless disregard, FAILED, likely intentionally, to thoroughly read then re-read my presented Exam documents as well as CMS SDO failed to thoroughly check and consider that and as relevant to the fact that Plaintiff/I had received Exam Grade A/SP for the exact same Title/Exam while/by using the exact same education, experience, etc. (within the prior year) as had been used for the current year’s Exam that upon which CMS SDO (all

named) DEFRAUDED with/by placing Exam Grade F/SF upon that current year's Exam. Plaintiff/I – not, yet, being/having been a State of Illinois Employee/Defendant(s), thereby being a mere tax-paying civilian citizen yet still being/having been a disability customer of CMS SDO – reported the entire ordeal to OEIG. Plaintiff/I never heard back from OEIG or CMS SDO on the matters/issues. Plaintiff/I reasonably opposed Disability Discrimination by reporting matters/issues to OEIG that is an agent of Illinois Attorney General and law-enforcing government agency. Plaintiff/I also reasonably opposed Disability Discrimination by reporting/having reported the matters/issues to Plaintiff/my DHS/DRS Counselor (via E-Mail). Plaintiff/I have all documented communication as evidence/proof.

Relevant: As documented/stated within this Pleading/Complaint is the “pattern” of government agencies/departments/offices/commissions, etc. – be they operating departments for the betterment of Human Rights (providing Human Rights services to the public: food/SNAP, Medical/Medicaid, etc.) or Civil/Human Rights-upholding and/or law-enforcing agents of the government – that they do not uphold Civil/Human Rights, abide State/Federal Laws, administer lawful Administrative Procedures, use/adhere to and abide by “Ethics,” adhere to and abide EEO/AA for Recruitment, etc. and so on. Evidentiary proof and/or Preponderance of Evidence, provided within the Complaint, along with many other documents submitted to government, and as adhered to Illinois Rules of Evidence, particularly Rule 401. Relevant Evidence, has more than proven that government breaches many laws (State and Federal), daily/quite often, by and through unlawful and retaliatory actions by not investigating discrimination charges, by not applying correct/lawful and governed Test/Exam Grade(s)—Fraud, by unlawful



retaliation, by unlawful suspension and termination, and by deceitful practices to cover up unlawful actions followed by “Deflection” of unlawful actions by using such, “scripted” terminology and excuses as “non-discriminatory/retaliatory reasons” to attempt to avoid Liability, etc. of breaches in many State and Federal laws.

6. On or about March 23, 2015, Defendant(s) breached federal law protecting my Civil/Human Rights under Rehabilitation Act by denying Plaintiff/my requested Reasonable Accommodations and Fair and Equal Opportunity on the job pursuant to EEO/AA. Plaintiff reasonably opposed discrimination by first informing Defendant(s) Human Resources Supervisor, Reginald Booker, of the/his unlawful actions by H. R./him and next by reporting unlawful acts/actions and discrimination, by Defendant(s), via E-Mail, to Plaintiff/my IDHS/DRS Sr. Vocational Rehabilitation Counselor, on the day of discrimination or thereabout. I retain the E-Mail as PROOF/EVIDENCE. Plaintiff/my DHS/DRS Counselor retain the E-Mail as well. Plaintiff/I sent that E-Mail of opposition to discrimination to IDHR/EEOC, IDHS Ethics Officer, Mr. Robert Grindle, IDHS BCA Supervisor, Mr. Jerry Post, and OEIG. All departments were Negligent, Culpable, and in Joint Liability for of/for non-compliance to law – misfeasance, malfeasance, nonfeasance, etc. – Breach/derelection of Duty, Breach of Contract, and many other. Plaintiff/I continued to oppose discrimination, Slander/Libel, and harassment by Defendant(s) – “senior-level” co-worker, Patti Peterson; Supervisor, Mr. Curtis Hastings; and Nursing Supervisors, Ms. Debbie Helsel and Ms. Jackie Boyd to/with who Patti Peterson created conflict/Hostile Work Environment and spewed/created Slander/Defamation of Character against me/Plaintiff – to Defendant(s) and throughout Plaintiff/my employment with Defendant(s) up to and beyond unlawful Retaliation of/by Suspension followed by unlawful Termination.



7. On or about June 5, 2015, Plaintiff opposed unlawful discrimination, harassment, hostile work environment, Slander/Libel, among others, by Defendant(s) by and through filing Grievance with AFSCME Union Local Union Steward, Steve Dillard (passed to Chief Steward, Kim Brown). Plaintiff/I retain the E-Mail to Union Steward, Steve Dillard, as PROOF/EVIDENCE.

8. On June 8, 2015, as/to/toward "Reasonable Opposition," Plaintiff/I FULLY INFORMED Defendant(s), by/through IDHS Ethics Officer, Mr. Robert Grindle, of unlawful actions, discrimination, etc. by Defendant(s). Plaintiff/I both telephoned and sent E-Mail to Defendant(s) Ethics Officer, Mr. Robert Grindle, who confirmed that Plaintiff/I had followed IDHS Policy, Procedure, etc., pursuant to IDHS Rules, Regulations, etc. by having first "Reasonably Opposed" unlawful actions/discrimination by Defendant(s) by reporting to Plaintiff/my supervisor (Mr. Curtis Hastings) then, next, by reporting matters to the supervisor's supervisor, Defendant(s) Department Director, Ms. Glenda Corbett, which Plaintiff/I thoroughly did and multiple times. I retain the E-Mail, as PROOF/EVIDENCE, to/from IDHS Ethics Officer, Mr. Robert Grindle. Mr. Grindle, within his reply E-Mail, suggested that Plaintiff/I further report matters of discrimination, acts against EEO/AA (or paraphrased, I have the E-Mail) to IDHS BCA, which Plaintiff/I did.

9. On or about Thursday, June 11, 2015, in the early a. m., in effort to further "Reasonably Oppose" discrimination, etc., and prior to "Official/officially being" Suspension 06-12-15, Plaintiff/I boarded Metra/public transportation, from the area in which Plaintiff/I live, into Downtown Chicago Union Station. Plaintiff/I walked, first, to IDHS Bureau of Recruitment (approximately 8<sup>th</sup> St. and Canal St. or thereabouts) because I thought that the office was there, to report matters to IDHS BCA. I was informed, after a lengthy period, by personnel at

Recruitment, as to where BCA is located. I/Plaintiff walked from Recruitment to 69 West Washington Street, Chicago (from the far south west end of Chicago Loop region to far north west end, more east to State St., of Chicago Loop region) where I was put in touch with IDHS BCA Supervisor, Mr. Jerry Post, who took my Complaint (see Amended AFSCME Grievance document of 06-05-15 and other documents submitted to State/Federal Civil Rights-upholding agencies—IDHR/EEOC for proof/evidence of my Charges, etc.). Defendant(s)/Mr. Post, Scanned and sent my documents of Complaint and evidence, etc. — including a copy of the E-Mail from IDHS Ethics Officer, Robert Grindle, my E-Mail of opposition and complaint to my IDHS/DRS Counselor, and my AFSCME Union Grievance — to, who Mr. Post informed me would be, "... An investigator in Springfield." The investigator is/was Ms. Annette VanHooser (see other documents of Complaint, opposition, etc. Plus see IDHS, IDHS BCA document of Perjury, Bias/Prejudice—unlawful being IDHS "VERIFIED RESPONSE" to IDHR/EEOC). Defendant(s) VERIFIED RESPONSE to IDHR is BIAS and PREJUDICE because/for DHS BCA—all having been reported to OEIG for MISCONDUCT, among others, by Plaintiff/me for having unlawfully closed Plaintiff/my DHS BCA Claim (No. issued) with Malicious and Reckless Disregard to State/Federal Laws that, to the contrary, state that Defendant(s)/DHS BCA MUST investigate ALL Complaints, etc. Plaintiff/I was/had been, to Defendant(s), both an IDHS/DRS Customer (presently, continuing) and an IDHS employee. Defendant(s) had multiple Federal law reasons to investigate Plaintiff/my Claims. Defendant(s) VERIFIED RESPONSE (sworn oath) to IDHR is Perjury for being packed with misdirected misinformation to DEFLECT from FACTS being RETALIATION, BREACHES in/of REHABILITATION ACT, other Federal and State laws, Breaches in State of Illinois Employees Ethics Act for MISCONDUCT, TRUTHFUL ORAL and WRITTEN STATEMENTS, among many others. Defendant(s)

Suspension (write up) as well as Termination papers are BOTH SLANDER/LIBEL and BREACH Illinois Ethics for Truthful Oral and Written Statements. Plaintiff/I submitted EVIDENCE/PROOF to IDHR/EEOC in or around June & July 2015 (at time of filing of both Charges) to/that/how said documents are slander/libel, etc. and unlawful at best by showing/proving/pointing out, WITHIN SUSPENSION document, the INCONSISTENCIES of FACTS as well as the ADMISSION OF LIBEL by Defendant(s) within the document because I have evidence/proof to the contrary of Defendant(s) Claim(s). Proof/Evidence, Facts, are as documented/pointed out to IDHR/EEOC, June & July 2015, by/within the two (2) 4-page Charge Complainant Questionnaires, imposed upon (Charge Complainant)/Plaintiff/me, and to both of which Plaintiff/I thoroughly responded, fully answering all questions with proven, documented facts, and with upwards of twenty pages to each Charge Questionnaire. IDHR/EEOC did not investigate/did NOTHING. EEOC investigator by and through deceitful practices 06-02-16—unlawful/lack of (non) investigation, denied Charge Complainant/Plaintiff, Truthful Responses to lawful inquires to EEOC about Plaintiff/my Charge evidence, documents, etc. EEOC Investigator 06-02-16, when/upon being asked whether EEOC/he has/is in possession of very important Charge Complainant/Plaintiff documents/evidence/proof being the two Charge Complainant Questionnaire Responses along with Plaintiff/my Response to Defendant(s) IDHR/EEOC VERIFIED RESPONSE, EEOC failed to provide/did not produce clear and truthful oral confirmation to the Plaintiff/my inquiries. EEOC, in cahoots to conspire against Plaintiff to DEFRAUD by/through protect Defendant(s) – government “Pattern” – breached Federal Rules, etc. and is culpable to/of/by Tortious Interference. Relevant: DHS BCA/Ms. VanHooser, and to include Mr. Post, along with Ms. Kimberly Foy—EEO/AA Officer, prior to breaching multiple State and Federal laws, including Unlawful Closure of Discrimination

Complaint pursuant to State & Federal laws, issued a Claim/Complaint No. to Plaintiff/me for the Claim/Complaint filed within the office of DHS BCA/Mr. Post at 69 West Washington Street, Chicago. Plaintiff/I signed the Sign-in Log at both the building front desk (security) and the IDHS BCA front area (security). Besides, how else would Ms. VanHooser had received the documents and become aware?

10. On or about June 11, 2015, prior to “Official” Suspension 06-12-15, Plaintiff Union, AFSCME, Local Chief Union Steward, Kim Brown, went to confer with Labor Management being Defendant(s) Director, Glenda Corbett, upon which time Defendant(s) Director admitted to AFSCME Union, Retaliation, by stating to AFSCME Chief Union Steward, Kim Brown, “I didn’t want to deal with this mess so I thought it best just to let her (Plaintiff) go...” AFSCME Chief Union Steward, Ms. Brown, telephoned Plaintiff/me, immediately thereafter – unknowing that I’d already taken the steps/measure to do so/having done so – stating Defendant(s) unwillingness to confer/budge on the issues, and AFSCME/she informed me/Plaintiff that AFSCME/she thinks/thought it in my best interest to file outside such as with DHS BCA, IDHR/EEOC, OEIG—all of which I did.

11. On or about June 12, 2015, Defendant(s) further breached Federal Law for Rehabilitation Act among Federal Law, State Ethics Act, Statutes, etc. by and through unlawful Retaliation and breach of Whistle Blower Act **740 ILCS 174/1 et seq.**, among others, by and through unlawful Suspension.

Pursuant to Illinois Administrative Order/Code #6, at/during that time thereby making State Law valid for that time, and according to **5 ILCS 430/ et seq. 2015 Ethics Orientation for State of Illinois Employees**, p. 3, Introduction/General Principles, State employees, including supervisors/managers, and directors have an “...Obligation to

notify OEIG if/when knowledge of conduct by State employee ... that is either unethical or unlawful..." Defendant(s) had DUTY, Prior to suspension/termination process, if so "believed" that Plaintiff/I had committed such "Misconduct/Unbecoming" to warrant termination of Plaintiff/my employment by Defendant(s), to report to OEIG, by Illinois Law/Statute, Defendant(s) "belief" that Plaintiff/I had been "Misconduct." Defendant(s) FAILED (likely intentionally) to follow State Law/Statute: Negligence, Negligence Per Se (Statute), Malicious and Reckless Disregard, Breaches in Illinois Statutes Administrative Procedure along with Ethics Act (Statute), etc.

Plaintiff/I has full knowledge that Defendant(s), by and through Joint Liability and Culpability of IDHR/EEOC and OEIG, has since intentionally altered/REDACTED Administrative Order #6 by changing it to/making it Executive Order #4 (02-26-16 – Likely purpose of/for "Intentional Delaying" of my Charges by all). Defendant(s) OEIG – I am certain is the author of such as well as by my knowledge of having provided OEIG with Plaintiff/my AFSCME Grievance – "ratified/redacted" (terminology) Administrative Order #6 to Executive Order #4(02-26-16) – by use of/with the very same or exactly similar language (to change, amend, alter the previous—A. O. #6) as has been documented/written by Plaintiff/me within my documents, particularly that of AFSCME Grievance, to OEIG for Claims/Complaints. Obviously Plaintiff/I have the evidence/proof. This BLATANT and Deceitful Practices move (to change Orders) by Defendant(s)—all/OEIG is an obvious effort – and upon being DECEITFUL PRACTICES, in or that State/Federal government, by and through Civil/Human Rights-upholding agencies Malicious and Reckless Disregard/Neglect of the Rights of tax-paying, disabled citizens for the sole, Malicious Intent – to PROTECT Defendant(s)

OEIG lest they be LIABLE, Culpable, and JOINT LIABILITY for MALICIOUS and RECKLESS DISREGARD of FEDERAL LAW 29 U.S.C. § 701 et al., et seq.

Rehabilitation Act, 740 ILCS 174/1 et seq., Whistleblower Act and as pertaining to Plaintiff/me and Plaintiff/my two IDHR/EEOC Disability Discrimination Charges.

IDHR, Defendant(s) IDHS and OEIG, are liable for breaches in 5 ILCS 100/Art. 1 et. al., Illinois Administrative Procedure Act, and 5 ILCS 430/ et seq., Illinois Ethics Act and EO/AA for not/never investigating my Claims/Complaints/Charges of Disability Discrimination.

EEOC is liable for breaches in U. S. EEOC COMPLIANCE MANUAL, among other U.S.C., C.F.R., etc. among breaches in many other laws by all parties, particularly Defendant(s). Orders etc. pursuant/pertaining to and relevant to my

Charges/Claims/Complaints, at that time, are the only relevant Orders, etc. to this Pleading/Complaint (Admin. Order #6, 2015, not Executive Order #4 02-26-16).

Plaintiff/I has proven misfeasance, malfeasance, nonfeasance upon MULTIPLE Torts.

12. On or about June 2015, Plaintiff opposed discrimination by filing a Charge of unlawful Retaliation/Whistle Blower Act, Discrimination, etc. with IDHR/EEOC, OEIG (issued Claim No.) as amended AFSCME Grievance of 06-05-15 to include Defendant(s)/IDHS admission to AFSCME of unlawful Retaliation, amongst other breaches in laws, etc. None of/NO State or Federal Civil/Human Rights/EEO/AA-upholding Department/Office/Bureau/Commission adhered or abided State or Federal Laws—breached many Rules, Policies, Procedures, Statutes, Regulations, Codes, including Negligence, Negligence Per Se, Non-compliance (to law), Breach/dereliction of Duty, Breach of Contract, Joint Liability and Joint Culpability, Liability (individual/single), misfeasance, malfeasance, nonfeasance, and many others. None/No Civil Rights/law-upholding agency investigated any,

nary (not one) my Federal Charges—Tortious Interference. IDHR and EEOC are in Joint Liability/Joint Culpability, among others, for UNLAWFULLY OMITTING/Negligence Federal Law pursuant to Rehabilitation Act along with by having Purposely/Intentionally Omitted (EEOC)—not provided my/Plaintiff Federal Rights to/which include EEOC Policy, Procedures, Rules, Laws, etc. IDHR and EEOC willfully and with Malicious and Reckless Disregard, intentionally failed to comply to Federal Law by intentionally omitting/failing to inform me/Plaintiff, a Federal (EEOC) Disability Discrimination Charge Complainant—Tortious Interference, amongst others—of Plaintiff/Federal/Legal Right to pursue/have pursued a Federal Court Case prior to/without need or necessity, by law, to have, first, filed State (IDHR) or Federal (EEOC) Charges (since June 2015). Within EEOC (non)-investigation (Negligence, Negligence Per Se), by EEOC Investigator, Robert Shelton, EEOC showed/presented very DISCRIMINATORY/Unlawful tactics/DECEITFUL PRACTICES by/through “lack of” investigation. EEOC showed/displayed WILLFUL INTENT to DISPELL, DISPROVE and DISCREDIT (amongst others) me/Plaintiff along with Plaintiff/my IDHS/DRS Counselor in EFFORT/ATTEMPT to DISCREDIT the official IDHR-submitted, to IDHS/DRS (Plaintiff/my DRS Counselor), “medical”/confirmation documents of my Federally Protected Disability. EEOC did not adhere or abide Federal (EEOC) Procedure, etc. pursuant to EEOC COMPLIANCE MANUAL to “FACT-FIND” rather than/not to attempt to FAULT/DISCREDIT, etc. EEOC Charge Complainant. I/Plaintiff Reasonably Opposed what I believe to be my/Plaintiff Reasonable Belief of Unlawful Actions by EEOC by submitting detailed E-Mail to EEOC (Investigator) fully and thoroughly detailing every word, inaction, and non-words/omitted words, questions, lack of/no questions regarding Defendant(s) admission to AFSCME Union of Unlawful Retaliation, omission of actions, omission seeking of lawful



facts/did not seek to FIND FACTS, etc. and continuing with other/further opposition throughout and up to on or about 08-19-16 and continuing (with E-Mail that I retain as proof/evidence).

Relevant to Charges/Case and referenced further within this Pleading document, EEOC breached U.S.C. or C.F.R. for EEOC, but definitely breached EEOC Compliance Manual Section 83 by making my Federal EEOC Charges "PUBLIC." I have the evidence/proof. EEOC is liable for threats/bullying/harassment/ultimatum. I have the proof/evidence. EEOC is liable for breaching Federal Law of/for Retaliation by and through Retaliation against Plaintiff/me for reasons of/because Plaintiff/I Opposed threats/harassment/bullying/ultimatum to EEOC, EEOC Investigator, Mr. Shelton, EEOC Enforcement Supervisor, Ms. Monique DeBusmann.

IllinoisCourts.gov – 60.00 Statutory Violations:

In Illinois, violation of a statute, ordinance, or an administrative ruling, regulation or order designed for the protection of human life or property is *prima facie* evidence of negligence or other fault. *French v. City of Springfield*, 65 Ill.2d 74, 357 N.E.2d 438, 2 Ill.Dec. 271 (1976); *Davis v. Marathon Oil Co.*, 64 Ill.2d 380, 356 N.E.2d 93, 1 Ill.Dec. 93 (1976); *Dini v. Naiditch*, 20 Ill.2d 406, 417; 170 N.E.2d 881, 886 (1960).

Administrative rules, regulations and orders must be validly adopted, and have the force of law. Such rules may also be admissible as *indicia* of standards of care. *Davis v. Marathon Oil Co.*, 64 Ill.2d 380, 356 N.E.2d 93, 1 Ill.Dec. 93 (1976); *American State Bank v. County of Woodford*, 55 Ill.App.3d 123, 371 N.E.2d 232, 13 Ill.Dec. 515 (4th Dist.1977).

The statute, ordinance, or regulation must be one which is designed to protect against the type of injury complained of, *Ney v. Yellow Cab Co.*, 2 Ill.2d 74, 117 N.E.2d 74 (1954), and the plaintiff must also show that he is within the class intended to be protected by

the statute, ordinance, or regulation. *Brunnworth v. Kerens-Donnewald Coal Co.*, 260 Ill. 202, 216-217, 103 N.E. 178, 184 (1913).

Plaintiff/I has proven MULTIPLE Torts among misfeasance, malfeasance, nonfeasance.

13. On or about June & July 2015 and continuing throughout the duration of Charges/Complaints, IDHS BCA and OEIG are in Joint Culpability and Joint Liability, among others, for neither ever having investigated my separate Complaints despite written law, particularly at said time of acts/incidents/unlawful actions, for both State government agencies to be/are lawfully bound to do so. OEIG kept sending back to DHS BCA my Complaint (reported/Opposed to EEOC within E-Mail). DHS BCA, Jerry Post, on or around October 2015 – when I'd gone there to present DHS BCA with my Official Reply to IDHS VERIFIED RESPONSE to IDHR – IDHS BCA/Jerry Post flat-out told Plaintiff/me, face-to-face, at the DHS BCA office in Chicago, that DHS BCA would not investigate and that IDHR would take no action. Defendant(s) IDHS/BCA, Mr. Jerry Post, refused to accept Plaintiff/my Reply/Response to Defendant(s) VERIFIED RESPONSE (Sworn Oath) to IDHR. Plaintiff/I immediately documented those facts (same day) on said document and presented as FACTS and evidence to OEIG (within same building) and to IDHR (in JRTC across the street) upon and immediately following my interaction with Defendant(s), DHS BCA. OEIG is within the same office building as DHS BCA at 69 West Washington Street, 20<sup>th</sup> Fl., Chicago. OEIG is liable for unlawfully informing or relevant law (lying to State employee/not yet terminated and/or Illinois tax-paying public), but definitely breached State Officials and Employees Ethics Act (Truthful Oral and Written Statements), by having informed Plaintiff/me that OEIG had/did send my OEIG Complaints (as assigned Complaint #) to Defendant(s)/IDHS Interim Secretary, James T. Dimas, office for investigation – doling out of/to investigate by IDHS OIG – of my OEIG Complaints,

and that Secretary Dimas office would contact Plaintiff/me. OEIG did NOT issue my OEIG Complaints to IDHS Secretary Dimas office as OEIG informed Plaintiff/me that/what had been the case/done. Plaintiff/I am aware because Plaintiff/I contacted Secretary Dimas office upon receiving no contact from Secretary Dimas office as OEIG had informed Plaintiff/me would be the Case. The details to be disclosed at another time, if necessary. However and FACTUALLY, Plaintiff/I submitted my details of Discovery back to OEIG/OEIG Investigator, Mr. Richard Musil, via E-Mail to (specifically stated to do) Submit Plaintiff/my Discovery to appropriate OEIG personnel. OEIG never responded/acted/informed—NOTHING. OEIG breached State of Illinois Ethics Act, Truthful Oral and Written Statements (amongst others), by having DECEIVED/deceitful practices to have followed rules of law by (unlawfully) claiming to have passed Plaintiff/my OEIG/Defendant(s) Complaint forward to Defendant(s) IDHS Secretary, James T. Dimas, office for the sole willful intent to shirk liability, culpability, and joint liability as well as to DEFRAUD Plaintiff/me pursuant to Complaint/Charge(s) of Discrimination against Rehabilitation Act as well as unlawful Retaliation—Torts Proven. However, Defendant(s) OEIG is liable for/of Deceitful Practices, FRAUD, Willful Intent, Malicious and Reckless Disregard, Breach/derelection of Duty/care, misfeasance, malfeasance, and nonfeasance, amongst many other breaches in law as a result of Defendant(s) OEIG (unlawful) INACTION and Deceitful Practices/breach in **5 ILCS 430/ et seq., 5 ILCS 100/Art. 1 et. al.** to/toward Plaintiff/my OEIG Complaints. Torts Proven by Plaintiff/me.

14. On or about July 12, 2015, Defendant(s), again, breached Federal Law, etc. by and through unlawful Termination. **740 ILCS 174/1 et seq.**, Whistleblower Act

15. On or about July 2015, Plaintiff/I Opposed Unlawful acts (amongst others within Charges) by filing IDHR/EEOC Charges (among filing other necessary Complaints/Claims with OEIG and continuing from 07-2015).

16. On or about August/September 2015, pursuant to **Supreme Court Rule 201k**, Plaintiff/I offered IDHR/EEOC Mediation to Defendant(s). Defendant(s) rejected Plaintiff offer.

17. On or about, continuing from June & July 2015 to December 2015/January 2016, IDHR had not/did not assigned Plaintiff/me an Investigator.

18. On or about December 2015/January 2016, Plaintiff/I transferred jurisdiction of my two (2) IDHR/EEOC Charges into the sole Federal jurisdiction of U. S. EEOC.

19. On or about from December 2015/January 2016, EEOC had not/did not assign Plaintiff/me with an Investigator despite EEOC knowledge of my two Federal Charges since June & July 2015 (initial filing of both charges) and despite my persistent contact/telephoning (as documented by Plaintiff/me) to EEOC regarding lawful handling of my two Charges—information, why no assigned investigator/investigation contact, status of EEOC Charges(2)—unlawful handling, by EEOC, of my 2 Charges. U. S. EEOC did not, lawfully, FACT-FIND, pursuant to EEOC Procedure/EEOC COMPLIANCE MANUAL. EEOC did not offer/have a FACT-FINDING Conference. Rather, EEOC attempted (brow-beat) to DISPUTE, DISPELL, disprove and DISCREDIT Plaintiff/me and Plaintiff/my IDHS/DRS Counselor. EEOC willfully and with Malicious and Reckless disregard solely and with joint liability (IDHR, DHS BCA, OEIG) intended to commit FRAUD by/to cover up for/protect Defendant(s). EEOC did not Fact-Find/provide a Fact-Finding Hearing. EEOC did not attempt ADR of any type or in any manner. EEOC Mr. Shelton, upon inquiry into Procedure, Laws, Policy, etc. along with inquiries to

EEOC as stated within this Complaint, merely stated to Plaintiff/Charge Complainant, that, "We (EEOC) do things different than they (IDHR) do..."

Copy/Paste Illinois.gov (IDHR) - The Cooper v. Salazar injunction: **Meaning of the Cooper Injunction**

The Department cannot assess the credibility of Complainant's testimony, the testimony of Complainant's witnesses or the testimony of Respondent's representatives or the witnesses of Respondent where there is conflicting testimony. In other words, if the determination of substantial evidence turns on issues of credibility, the Department should make a finding of substantial evidence so that a trier of fact may resolve those issues of credibility. This means that if a determination of lack of substantial evidence requires the Department to make a finding of fact as to conflicting evidence, the Department will make a finding of substantial evidence so that credibility may be resolved by the Human Rights Commission at a Public Hearing.

The Illinois Human Rights Act defines "substantial evidence" as: "evidence which a reasonable mind accepts as sufficient to support a particular conclusion and which consists of more than a mere scintilla but may be somewhat **less than a preponderance**".

Illinois Human Rights Act §7A-102(D)(2), codified at 775 ILCS 5/7A-102(D)(2). Plaintiff/I has presented more than a preponderance to Clear and Convincing Evidence and pursuant to Illinois Court Rules.

20. On or about June 2, 2016 and continuing and as referenced/documented within previous enumerated points of this Pleading/Complaint as well as below by numbered Complaint Counts within this Complaint, EEOC commenced to breach many Federal and/or State laws, rules, policies, procedures, codes, regulations, and so on, etc.

In August 2016, for seventeen days, from the Northern Hemisphere to the Southern Hemisphere (Brazil); from the Western Hemisphere to the Eastern Hemisphere, the entire world came together in the spirit equality and fairness and the coming together of the entire world to work, play, celebrate, live, and compete together at the 2016 Games of the Thirty-first Olympiad in Rio De Janeiro, Brazil. The International Olympic Committee (IOC) works tirelessly to fairly ensure that every Olympian from every corner of the globe (Earth) will be treated fairly and with equality in competition in every single event throughout the entire Olympic Games – Summer Games and Winter Games – and in every Host City in every country around the world that the Games are and will be hosted.

The United States Federal Government (EEOC) or even State Government (IDHR, IDHS BCA, and OEIG) cannot come together to ensure the fair and equal treatment (Civil/Human Rights) of the citizens of this "One Nation."

**UNDER U.S.C. for the REHABILITATION ACT of 1973, (and as amended) I NEEDED NOT FILE A CHARGE** at either the State (IDHR) or Federal (EEOC) levels **PRIOR TO FILING A SUIT IN FEDERAL COURT**. I did so in **ORDER to BE FAIR and to PROVIDE ("EQUAL") OPPORTUNITY** to the defendants (IDHS) as well as to State and Federal **HUMAN- and CIVIL- RIGHTS-UPHOLDING AGENCIES/DEPARTMENTS** to seek **FAIR, EQUAL, UNBIASED, neutral, lawful etc., justice** for American tax-paying citizens and American Disabled, Tax-paying citizens. I have not found, **IN ANY INSTANCE**, past and present, **THIS TO BE AN ACTUALITY**. Last Summer (2015), **IN ACCORDANCE with IDHR/(EEOC) PROCEDURE and PURSUANT to ILLINOIS SUPREME COURT RULE 201(k)**, essentially; upon **FIRST OPPORTUNITY, I even offered mediation to IDHS, while Charge was still with IDHR (about Aug./Sept. 2015), who REFUSED my offer**. That incident was documented in my calendar and should, lawfully, be on file with IDHR/EEOC, now only with EEOC. IDHR **NEVER** appointed an Investigator to my two (2) IDHR/EEOC Charges (from June 2015, one Charge, and July 2015, one/second Charge) up to such time that I removed my Charges from IDHR and solely placed

under EEOC Charge—December 2015/January 2016, approximately. I HAVE also documented some of the unjust, biased, unfair, etc., treatment and inappropriate, UNLAWFUL “Findings” as well as unlawful acts/actions by and through government, within this documents as well as being documented within many other – and some being my – supporting documents. **U. S. EEOC is DISREGARDING** applicable Federal Code, Rule, Policy, Procedure, Laws in regard to my Charges and the ISSUES/BASIS(es) of my Federal Charges.

UNITED STATES is UNDER SCRUTINY FROM, and AROUND, the WORLD for ITS TREATMENT OF “BLACK AMERICA.” LET’S FACE IT – and President Obama REFERENCED it, as well, in HIS July of 2016 Dallas, TX Speech for the slain Dallas officers who were slain as a result of the injustices by police and the United States, against Black Americans, primarily Black men – THE UNITED STATES of the AMERICAS HAS BEEN UNDER WORLD SCRUTINY and HAS BEEN FROWNED UPON by THE WORLD but MORESO BY ITS (LEGAL) CITIZENS, PARTICULARLY, BLACK AMERICAN CITIZENS (not an African, Jamaican, Islander, Black South American, etc. who are in the U. S. on Visa, etc. or as a citizen—Black American “mutts,” as the same as White Americans, who have been here for hundreds of years), BECAUSE THE TRAVESTY OF INJUSTICE AGAINST AMERICAN CITIZENS WHO DO NOT MEET THE “White American, Wealthy American and often including Republican, and DISCRIMINATING AMERICAN ‘NORM,’ IDEAL, ‘DREAM,’ WAY, WAY-OF-LIFE,” etc. and whatever, WHICH HAS BEEN THE “American Way” for hundreds and hundreds of years—Centuries, in fact, and already nearly seventeen (17) years into this new millennium, albeit, not a “new beginning” for the U.S.A. IT IS A NATION GONE WILD –and, yet, the Original Settlers considered Africans (of the Continent of Africa), and other indigenous peoples, to be “savages.” There are far too many Police injustices—murders, slayings, brutality of Black Americans, particularly men, this year alone—this month of July 2016—to even count, and to mention is devastating. Just this 07-20-2016, Miami, FL Police shot, non-life-threatening, (for no rational or justified reason) an un-armed Black male who was merely tending to his job as a Behavioral Therapist dealing with a group-home resident, with autism, who’d run out of the facility. Why? Query that. The victim asked the officer, “Why did you shoot me?” The victim states that the officer responded, “I don’t know.” What in the name of Jesus Christ is that? In the name of God, what is becoming of this Nation? It certainly is not improving for the better and not at all for the better and betterment of/toward Black American citizens. MLK, Jr., JFK, Lincoln, RFK, Lennon—all assassinated for believing in a “Just” cause and for “Doing the Right Thing.” I STRONGLY BELIEVE THAT HAD THE NATIVE AMERICAN PEOPLES, indigenous – (those who survived) – NOT BEEN AFFORDED REPARATIONS, YEARS AGO, THEY WOULD, TOO, BE SUFFERING, MORE OUTWARDLY, THEIR INJUSTICES AS WELL AS “Black America.” What, outwardly, do U. S. citizens hear from Native Americans about anything, other than, occasionally, when they are being offended?

DRAWING from THAT BIT OF TRUTH, FACT, HISTORY, and REALITY of THE U.S.A., IT SHOULD BE EVIDENT, OBVIOUS, and more THAN RECOGNIZABLE, PERCEIVABLE, BELIEVABLE, AND ACCEPTED THAT THE U.S.A., more specifically to this Case, however, ILLINOIS (named of an “Indian”/Native Tribe), IN FACT, HAS SOLE LIABILITY and is CULPABLE along with OEIG (IDHR, CMS, and possibly EEOC—for lack of FAIR, thorough, etc. investigation) of LIABILITY (along with the others) by and through NEGLIGENCE/per se (Statutes), INACTION, DERELICTION/BREACH OF DUTY, BREACHES of CONTRACTS, MALICIOUS and RECKLESS DISREGARD TOWARD LAWS (State and Federal) and that of DIVERSITY AMONGST MANKIND.

Plaintiff/I bring forth these charges, by Counts (60+, approximately), against Illinois Department of Human Services, et al. along with State and Federal agencies/Departments/Offices, etc. that that conspired in liability and culpability, be they singly or jointly, with IDHS in breaches of all State and Federal laws as listed within this Case/document and my supporting documents and any and all State and Federal Rules, Regulations, Procedures, laws, etc. that correlate to and with the charges brought



forth within this Case before this Honorable Court. I have proven, for Civil Case, Preponderance of Evidence. I show the elements of torts; negligence/per se:

(Proven) Elements of Torts: Duty, Breach of Duty, Injury, Causation/cause of injury

(Proven) Elements of Negligence: Duty, Breach of Duty, Cause in Fact (Negligence, Malicious and Reckless Disregard), Proximate Cause (Duty of Care to/of Protected Rights of Disabled Citizen under Rehabilitation Act--Willful Intent to Defraud Plaintiff, Negligence, FRAUD), Damages (Harm: Loss of Employment, Loss of Income, stress, anxiety, ailments, etc. and others; see Pleading, AFSCME Grievance 06-05-15, IDHR/EEOC Charge Questionnaires—2)

Count 1(a)(b)(c)(d)(e)(f)(g): State of IL and the IL Dept. of Human Services (IDHS) BREACHED/is in DERELICTION of DUTY and Breach of Contract for, by, and through:

(1) U. S. Department of Labor; Section 504, **Rehabilitation Act of 1973** (and any correlating/supporting sections, et al.): **29 U.S.C. § 701** (and/or any other correlating/supporting sections; Reckless Disregard)

(a) IL Human Rights Act, **775 ILCS 5/Art. 1 et al.**, et seq. (and/or any other correlating/supporting Art. and/or Sec.) – Malicious & Reckless Disregard; Negligence & Negligence per se

(b) **5 ILCS 100/Art. 1 et al.**, Illinois Administrative Procedure Act – Breach of Duty; Negligence/per se

(c) **740 ILCS 174/1 et seq.**, Whistleblower Act – Malicious & Reckless Disregard; Negligence/per se

(d) **720 ILCS 5/33E-1 et al.**, Public Contracts

(e) **5 ILCS 430/ et seq.**, State Officials and Employees Ethics Act; Malicious Disregard; Negligence/per se

(f) **735 ILCS 5/1-109; 720 ILCS 5/32-2 et al.**, Perjury – Malicious Disregard; Breach of Duty; Negligence “

(g) **720 ILCS 5/17-1 et al.**, Deceptive Practice – Malicious and Reckless Disregard; Unlawful Hiring

(1.1) **42 U.S. Code § 12203 - Prohibition against retaliation and coercion**

(i) **10.4A.1 CIVIL RIGHTS—TITLE VII—“ADVERSE EMPLOYMENT ACTION” IN RETALIATION CASES;**

U. S. Courts of the Ninth Circuit, *Burlington Northern and Santa Fe Railway Co. v.*

*White*, 548 U.S. 53, 68 (2006)—et seq.: *e.g., Dahlia v. Rodriguez*, 735 F.3d 1060,

1078 (9th Cir.2013)(en banc) (involving employee’s placement on administrative leave,

deprivation of ability to take promotional exam, and loss of pay and opportunities for investigative or other job experience; *Manatt v. Bank of Am., NA*, 339 F.3d 792, 802 (9th Cir.2003) (involving denial of transfer); *Hashimoto v. Dalton*, 118 F.3d 671, 674 (9th Cir.1997) (involving negative job reference)

(ii) Breach of State of Illinois employee contract and AFSCME Labor Union Contract

(iii) Breach of State of Illinois disability customer contract/Services Plan to include CMS SDO services under DHS/DRS (Division of Rehabilitation Services) governed under the Rehabilitation Act of 1973 – Malicious/Reckless Disregard; Negligence/per se, Statutes

(iv) Breaches in/Dereliction of Duty (IDHS, OEIG, government offices as applied) to me as a State employee and to me as a State of Illinois disability customer and tax-paying citizen – Malicious & Reckless Disregard; Negligence/per se of Statutes/Laws

(v) **Bid Rigging/Blocking/Tortious Interference/Malicious & Reckless Disregard by DHS and Negligence/per se** in/of my EEO and of Statutes/State and Federal Law surrounding, “promotion, investigation of other job opportunities,” etc. -- *e.g., Dahlia v. Rodriguez*, 735 F.3d 1060, 1078 (9th Cir.2013)(en banc) (involving employee’s placement on administrative leave, deprivation of ability to take promotional exam, and loss of pay and opportunities for investigative or other job experience; *Manatt v. Bank of Am., NA*, 339 F.3d 792, 802 (9th Cir.2003) (involving denial of transfer); *Hashimoto v. Dalton*, 118 F.3d 671, 674 (9th Cir.1997) (involving negative job reference)

State of IL, IDHS/DHS BCA, DHS BUREAU OF RECRUITMENT, OEIG, CMS—all incumbent are liable for Breaches in many/multiple other Laws, possibly including 740 ILCS 175/et. seq., False Claims, 720 ILCS 5/33 et seq., Bribery Re: Issues reported of Time/Pay/Payroll and the misuse and abuse of a State employee; – There are many, many other breaches in State and Federal Laws, Rules, Codes, Policies,



Procedures, etc. including Hostile Work Environment, Harassment, Slander and Libel (on the job), and Libel within "Official" State of Illinois and IDHS documents being as, but not limited to the (unlawful) Suspension DHS papers and the (unlawful) Termination Papers from CMS through IDHS, among other broken laws. As of 08-16-16 by and through INACTION, misfeasance, malfeasance, nonfeasance among others and to include misconduct by and through an E-Mail of threatening, harassing, bullying, ultimatum nature, this Case is also to include U. S. EEOC (see Count 4)

**I am a (present, past, continuing) disability Customer of IDHS/DRS (Division of Rehabilitation Services)** as well as having been a CMS SDO customer for State of Illinois Central Management Services Successful Disability Opportunities and as governed under Rehabilitation Act of 1973.

EEOC, with TORTEOUS INTERFERENCE, MALICIOUS and RECKLESS DISREGARD, INTENTIONAL OMISSION, NEGLIGENCE, NEGLIGENCE PER SE (Statutes), etc. and other breaches of laws, etc., FAILED to INFORM ME, EEOC 2-CHARGE(s) COMPLAINANT, OF MY FEDERAL RIGHTS, INCLUDING MY RIGHT FILE/have filed FEDERAL LAW SUIT, Pursuant to U.S.C., U. S. Dept. of Justice, Disability Rights and Laws, Rehabilitation Act, Sec. 504, PRIOR TO HAVING FILED and/or WITHOUT HAVING SPENT UPWARDS of 15+ month (at time of draft of this Pleading) waiting for IDHR/EEOC 2 CHARGES to be lawfully adhered, abided, attended, investigated, "Found," etc. that is now in sole jurisdiction of U. S. EEOC since Dec. 2015/Jan. 2016. EEOC is Liable for WILFULL/INTENTIONAL DELAY of my FEDERAL CHARGES/FEDERAL COURT CASE.

EEOC DID NOT follow EEOC COMPLIANCE MANUAL in regard to "Investigating/investigatory procedures" that inform/instruct EEOC Investigators to "seek information, FACT-FIND be gentle, listen," etc. (as paraphrased). EEOC Investigator Robert Shelton spent much of the time of the EEOC (non)"investigation" disputing, refuting, and attempting, in every way, to DISPELL, DISPROVE and DISCREDIT me, my DISABILITY, and, importantly, my IDHS/DRS Sr. Vocational Rehabilitation Counselor, Ms. Janet Harris, despite, and seemingly IN SPITE of, the fact that Ms. Harris had filled out, signed, and dated, then returned – via State of Illinois, DHS mail from her IDHS/DRS office – the forms from IDHR for confirmation of Charge Complainant disability.

EEOC disregarded EEOC COMPLIANCE MANUAL regarding, "Employer non-retaliatory reasons for termination" in that EEOC WILFULLY NEGLECTED MY, likely 200 pages, of evidence/proof, etc. for my Charges that had/have been submitted, primarily hand-delivered by me/Plaintiff, to IDHR/EEOC.

During EEOCs (non)"investigation" into my 2 Federal Charges, Mr. Robert Shelton, refused to inform/admit to me whether or not EEOC is in possession of the very significant and relevant document of/to my Charges. I POINTEDLY asked EEOC/Mr. Shelton if EEOC is in possession of my RESPONSE/REPLY to IDHS, DHS BCA "VERIFIED RESPONSE" (Sworn Oath) to IDHR. My response "FORMALLY DECRIES" that IDHS, DHS BCA has not only further breached State laws against me, my disability, my Charges, etc., but also that IDHS, DHS BCA, within their Sworn Oath, has PERJURED IDHS, DHS BCA, Annette VanHooser, Investigator/author of PERJURY, Mr. Jerry Post, DHS BCA Supervisor at 69 W. Washington Street, 20<sup>th</sup> Fl., Chicago, and Ms. Kimberly Foy, DHS BCA EEO/AA Officer—all of who I'd previously reported to OEIG for Breaches in/of Illinois Ethics Act, Misconduct, etc. by having UNLAWFULLY CLOSED my DHS BCA Charge/Claim—without/did not INVESTIGATE despite State and Federal law mandating that DHS BCA investigate all Charges... etc. On top of PERJURY, IDHS, DHS BCA and all named above, were named within my Response to IDHS, DHS BCA VERIFIED RESPONSE (Oath), for being BIAS and PREJUICE within/by writing the VERIFIED RESPONSE. I DECRIED that upon having been reported for MISCONDUCT, NONE OF IDHS SHOULD HAVE HAD ANY HAND IN RESPONDING TO IDHR/EEOC AND THAT BY HAVING DONE SO, THE DOCUMENT IS UNETHICAL, BIAS, and PREJUDICE, AND UNLAWFUL. I supplied Defendant(s) OEIG, IDHS, DHS BCA, and IDHR/EEOC with a copy of my Response. IDHR/EEOC,

particularly EEOC, DID NOT INVESTIGATE MY CHARGES. EEOC DID NOT INFORM ME, FROM THE START (June 2015), OF MY FEDERAL RIGHT TO FILE A FEDERAL COURT CASE DIRECTLY WITH NO REASON, ACCORDING TO FEDERAL LAW, FOR FIRST FILING WITH WITH EEOC.

EEOC disregarded the EEOC COMPLIANCE MANUAL by NOT FOLLOWING the FEDERAL PROCEDURE that states that EEOC should consider, by reading, fact-finding, seeking answers by asking questions, etc. (paraphrased) to "FIND" that RESPONDENT/DEFENDANT used "non-discriminatory" reasons for Retaliatory Termination as a reason for "cover-up" (etc., paraphrased) of the fact/truth of why EMPLOYEE (I, me) WAS/HAD BEEN RETALIATED AGAINST BY SUSPENSION/TERMINATION.

IDHR/EEOC, according to "GOVERNMENT PATTERN" as documented by a respectable Civil Rights Coalition as well as printed by EEOC in the EEOC manual/document COMMON ERRORS BY FEDERAL AGENCIES IN DISMISSING COMPLAINTS OF DISCRIMINATION, HAD NO INTENTION OF LAWFULLY, INVESTIGATING MY TWO CHARGES NOR OF ABIDING STATE AND FEDERAL LAWS PURSUANT TO FEDERAL DISABILITY DISCRIMINATION CHARGES

These FACTS and TORTS are PROVEN within this Federal Court Pleading.

EEOC RETALIATION; EEOC BREACH in CONFIDENTIALITY -- I presented these FACTS, especially the FACT that EEOC HAD NOT ADDRESSED, GIVEN, PROVIDED, etc. my FEDERAL RIGHTS, to EEOC Enforcement Supervisor, Ms. Monique DeBusmann. EEOC unlawfully made my CONFIDENTIAL CHARGES "PUBLIC," and EEOC CLOSED my 2 EEOC Charges.

REASONABLE BELIEF of BREACHES in many LAWS by EEOC

Upon EEOC UNLAWFUL CLOSING (Retaliatory reasons, etc.) of my two Charges and because I was awestruck by the FACT that FEDERAL GOVERNMENT by and through U. S. EEOC, whose sole role is to abide and uphold law and defend the Civil/Human Rights of U. S. citizens, themselves BREACHED MANY LAWS.

As a result, I submitted, via E-Mail, to EEOC/Ms. DeBusmann further, INDISPUTABLE, CONCRETE EVIDENCE and PROOF (one piece of many) of my DISABILITY DISCRIMINATION CHARGES/DISABILITY along with the FACT that I AM A DISABILITY CUSTOMER of IDHS/DRS. Those documents not only prove my association with IDHS/DRS and that I am disabled, they PROVE that IDHS, DHS BCA, OEIG,--all incumbent, are GUILTY of ALL ISSUES/BASIS(es) of my CHARGES and that Respondents/Defendants, IN FACT, used manipulation, deceitful practices, etc. by and through "non-discriminatory reasons" as COVER-UP (etc., paraphrased) for/to/of UNLAWFUL REASONS/RETAIATION FOR/OF TERMINATION. EEOC INTENTIONALLY FAILED TO LAWFULLY INVESTIGATE. EEOC DID NOT SEEK EVIDENCE, PROOF, INFORMATION, FACTS, etc.—NOTHING. In FACT, as stated above, EEOC DECEITFULLY COVERED-UP FACT/TRUTH ABOUT IMPERATIVE DOCUMENTS RELEVANT AND OVERWHELMING IMPORTANT (solid evidence, proof—Rules of Evidence 401. among others) DOCUMENT, my RESPONSE to IDHS VERIFIED RESPONSE (Sworn) to IDHR—Perjury, BIAS, PREJUDICE—UNLAWFUL!

I HAVE SOLID EVIDENCE and PROOF of, for, to supporting my two Charges ISSUES/BASIS(es) and that also prove ABOVE Prima Facie to PREPONDERANCE of EVIDENCE likely to CLEAR and PRESENT EVIDENCE.

EEOC is neglected Illinois law pertaining to evidence – Illinois Rules of Evidence/Illinois Courts – Illinois, consistently, uses Preponderance of Evidence—I a very well-aware of that fact. EEOC has not considered it. EEOC has consistently and persistently as well as purposefully, intentionally and with willful malice

and reckless disregard had been negligent/Negligence, Negligence Per Se pertaining to my Civil/Human Rights as matters of my Federal Disability Discrimination Charges/Case. (See Count 4, all sub counts)

08-16-16 – Copy/Paste E-Mail text from to EEOC Investigator Mr. Robert Shelton  
Copy/Paste information from **Wex Legal Dictionary Online** at Cornell University Law:

**preponderance of the evidence**

A requirement that more than 50% of the evidence points to something. This is the burden of proof in a civil trial.

For example: At the end of civil case A v. B, 51% of the evidence favors A. Thus, A has a preponderance of the evidence, A has met their burden of proof, and A will win the case.

Copy/Paste information from **Illinois Rules of Evidence** at Illinois Courts.gov:

**Rule 401.**

**DEFINITION OF "RELEVANT EVIDENCE"**

"Relevant evidence" means evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.

EEOC, not only have I proven my two (2) IDHR/EEOC (now solely with EEOC) Discrimination Charges by PREPONDERANCE of EVIDENCE (something consistently used by State of Illinois government, particularly in Civil matters), I have, evidently, done so pursuant to Illinois Court Rules.

(End 08-16-16 E-Mail text to EEOC/Mr. R. Shelton)

Regarding my PROTECTED CLASS DISABILITY under Section 504 (and all relevant and related Sections, etc.) of the REHABILITATION ACT of 1973 (and as Amended) and possibly ADA, EEOC, IDHR (past experiences and present), OEIG, IDHS--all, DHS BCA (Civil Rights, EEO/AA), OEIG (laws for State of Illinois under Attorney General of Agents/Offices of the Governor) are ALL CULPABLE, JOINT LIABILITY, BREACH/DERILITION of DUTY, BREACH of CONTRACT, NEGLIGENT – among all of the many other U.S.C., C.F.R., IL STATUTES, LAWS, RULES, POLICIES, and PROCEDURES as listed/named within the FEDERAL COURT CASE and those that are not.

EEOC has disregarded EEOC COMPLIANCE MANUAL pertaining to PROCEDURE for INVESTIGATION of CHARGES, among other.

EEOC disregarded EEOC COMPLIANCE MANUAL SECTION 83 relating to CONFIDENTIALITY—EEOC made portions of my Charges "PUBLIC." (see Count 4(e))

EEOC disregarded EEOC manual/document "COMMON ERRORS by FEDERAL AGENCIES in DISMISSING COMPLAINTS of DISCRIMINATION..." EEOC dismissed my Charges upon/as a result of my disagreement/disapproval/"dispute"/"protest?"/"challenge?" (for lack of the word EEOC uses in EEOC COMPLIANCE MANUAL) of EEOC against the BREACHING of many LAWS, etc. by EEOC in regard to my two EEOC (IDHR) Charges and also, primarily, because I did so several time beginning with IDHR, while my Charges were still in IDHR Jurisdiction, and continuing to and especially with EEOC, once my Charges were within Federal EEOC jurisdiction. I reported back to Investigator R. Shelton that he DID NOT/HAD not PROVIDED a LAWFUL investigation. Mr. Shelton DID NOT thoroughly investigate my Charges. Mr. Shelton did not ask pertinent, relevant, ISSUE/BASIS(es) FACTS questions pertaining to my Charges. I

sent E-Mail to Mr. Shelton strongly stating my "dispute" within a few days of his "so-called" (non) investigation into my two (IDHR)/EEOC Charges. (see Count 7)

EEOC/Mr. Shelton sent to me, what I have REASONABLE BELIEF, is threat/bullying/harassing/ultimatum

I reported, as complaint to EEOC Enforcement Supervisor, Ms. Monique DeBusmann, what I felt had been a threatening E-Mail to me by EEOC/Mr. Shelton. I also reported to Mr. Shelton and to Ms. DeBusmann that EEOC HAD NOT provided me with my Federal Rights, EEOC Procedures, EEOC Policy, etc. or and especially that EEOC DID NOT inform me, not even upon sole jurisdiction of my 2 Charges in Dec. 2015/Jan. 2016, of the FACT that, IN ACCORDANCE TO FEDERAL LAW PURSUANT TO REHABILITATION ACT; I, A PROTECTED RIGHTS DISABLED CITIZEN UNDER REHABILITATION ACT, AM NOT REQUIRED TO FILE FEDERAL/EEOC CHARGES, for a "Right"/"Right-to-Sue" Letter from EEOC, PRIOR TO (for any reason) FILING A FEDERAL COURT CASE.

EEOC Enforcement Supervisor, Ms. Monique DeBusmann, failed to comply to EEOC procedure/policy, laws, etc. EEOC/Ms. DeBusmann unlawfully closed my 2 EEOC Charges.

08-19-16 – Copy/Paste E-Mail content to EEOC Enforcement Supervisor, Ms. Monique DeBusmann (See full Copy/Paste E-Mail content within Count 4(e))

EEOC

Enforcement Supervisor, Monique DeBusmann:

IMPORTANT State of Illinois CMS Section 504--Rehabilitation Act documentation, RELEVANT to my U. S. EEOC Disability Discrimination Charges as PROOF/EVIDENCE of my Charges -- Illinois Rules of Evidence Rule 401. RELEVANT EVIDENCE -- is as "Attachment," below, to this 08-19-16 E-Mail.

Be advised that everything, every communication between EEOC and me, U. S. EEOC Civil Rights Disability Discrimination Charge Complainant, has been Amended/documented to/within my Federal Court Case, especially that EEOC BREACHED C.F.R. CONFIDENTIALITY by making my Federal (EEOC) Civil Rights Charges "PUBLIC."

I have proven a multitude of EVIDENCE AGAINST EEOC for MULTIPLE BREACHES in U.S.C., C.F.R., Federal Rules, Policies, Procedures, and Laws by the PROVEN FACT that EEOC has BREACHED MY CIVIL RIGHTS FOR/IN HANDLING MY FEDERAL CHARGES by not ABIDING/ADHERING and/or BREACHING LAWS FOR:

SUPREME COURT RULE 201k – Reasonable Attempt to Resolve Differences (Charges--ADR, Settlement)

Breach/Dereliction of DUTY

Preponderance of EVIDENCE

Rules of Evidence, particularly Rule 401.

Negligence, Negligence Per Se (Statutes)

INACTION (unlawful)

Malicious and Reckless Disregard

Threats/Bullying/Harassment/Ultimatum

Retaliation

EEOC COMPLIANCE MANUAL

EEOC SEC. 83 DISCLOSURE of INFORMATION -- EEOC made my CONFIDENTIAL information PUBLIC

EEOC document, "Common Errors by Federal Agencies in Dismissing Complaints of Discrimination..."

etc., so on, and so very many other BREACHES in Laws by U. S. EEOC

"But for" IDHS, OEIG, IDHR, IEEOC Breaches in these U.S.C., C.F.R., **Statutes, and laws** and unlawful actions (afore mentioned, above), among **MALICIOUS and RECKLESS DISREGARD, Negligence/per se**, misfeasance, malfeasance, and nonfeasance, MISCONDUCT, CONDUCT UNBECOMING, and other (listed & documented, specifically to IDHR/EEOC, **DHS/BCA, OEIG**, and all related) policies, procedures, and rules, I would not be EGREGIOUSLY, DETRIMENTALLY, and SEVERELY HARMED by being: jobless/unemployed, homeless and without viable employment, income, and salary in order to sustain my health and my way of life/lifestyle (a decent, livable roof, decent clothes, furnishings, and healthy food to eat, etc. as well as having entertainment monies available for peace, peace-of-mind, and good holistic health).

"But for" the **DIRECT LIABILITY** of **DHS** along with **TORTIOUS INTERFERENCE/Tortious Acts** among **JOINT CULPABILITY** between offices, Commissions, divisions, agencies, Departments, branches of State government (and even Federal; see EEOC/R. S.) to include **but to not be limited to TORTFEASORS DHS/DHS BCA and OEIG** (IDHR; EEOC; CMS, too –see within this and other supporting document) as a result of deceitful practices, manipulation, dishonesty, and among and including any and all of the aforementioned **Statutes, U.S.C., and/or laws**, policies, and procedures stated within this document and/or those that correlated and apply that may not be stated, I would not be WITHOUT any one of many of the 40+ (approximately) Titles that I sat for CMS/CMS SDO Testing, Grading, Exams. More pointedly, I could hold the Administrative Assistant II Title that which CMS broke many State and Federal Laws, including ADA and Rehabilitation Act of 1973, in **CMS' FRAUD SCHEME to CHEAT me out of that Title**. More specifically, "**But for**" **JOINT CULPABILITY between DHS and OEIG** (see within this Doc and other supporting Docs), among the others mentioned, **I would hold one of the many Titles that I'd been "Referred" for and/or "Bid" on and those which DHS committed TORTIOUS INTERFERENCE among being directly liable for Breach of AFSCME Labor Union Employee/Employment Contract/State PUBLIC CONTRACT as well as State of Illinois Laws barring interference with Upward Mobility, Bid Rigging/interference, and other as CITED within the AFSCME Contract as well as within Illinois Law.**

"But for" IDHS tortious actions, INACTIONS, liability, FRAUD, BREACHES IN CONTRACTS, BREACHES in DUTY, NEGLIGENCE, and culpability (along with other State agencies named/listed), among others, I would not be suffering from stomach problems, nervousness and anxiety, STRESS, joint, muscle, shoulder pain, sleeplessness, and any and others as determined.

Count 2(a)(b)(c),(c)(1): Contains direct excerpts Copy/Paste from "Official" Complaints/Charges to— IDHR/EEOC, IDHS BCA, OEIG, AFSCME Union Grievance to Chief Union Steward, dated 06-05-15 (prior to Termination, 07-12-15), two IDHR/EEOC Questionnaires 4-pages each for each of my two (2) IDHR/EEOC Federal Discrimination Charges (as all pertaining to and reported for my Federal Charges/Case)

(2) **42 U.S. Code § 12203 - Prohibition against retaliation and coercion**

**740 ILCS 174/1 et seq.**, Whistleblower Act – Malicious & Reckless Disregard; Negligence/per se According to *2015 Ethics Orientation for State of Illinois Employees*, p. 3, Introduction/General Principles, I have an "...Obligation to notify the appropriate authorities if/when I have knowledge of conduct by State employee ... that is either unethical or unlawful..."

**Ludeman Center, Center Director Glenda Corbett Eggregiously Breaches DHS Ethics, My Civil Rights, and Retaliation Law and Whistle Blower Law (Whistleblower Act, 740 ILCS 174/1 et seq.) – Glenda Corbett Admitted Unlawful Termination/"Railroading" – Aiding & Abetting Discrimination & Harassment**

Count 2(a):



Thursday, June 11, 2015

Breaches in DHS Ethics, Whistle Blower Law, Retaliation Law (see under 6/12/15 in AFSCME Grievance) – Kim Brown, Chief Union Steward, went to confer with Glenda Corbett RE: the “Pre-D” matter – Kim left a V. M. Msg. suggesting I seek “outside” assistance (such as: OEIG; DHS Bureau of Civil Affairs; EEOC, IDHR) – seemingly as though, for my perception, that she was stating that G. C. was adamant about releasing me from my job (“Terminating”) and unwilling to conference, talk, budge...

Breaches in DHS Ethics, Whistle Blower Law, Retaliation Law –

Friday, June 12, 2015 (Today) – See the IDHS Ludeman Center Disciplinary Action Form (dated today) stating – (my notations, Copy/Paste below):

Upon receipt of my copy of this document after having signed and while in the presence of AFSCME Chief Union Steward, Kim Brown; Curt Hastings said, “you need to leave NOW and you can’t be on grounds or come back.” Curt Hastings mentioned nothing about my Illinois/DHS/Ludeman Center I.D. He did not request that I hand it over nor did he state that I must relinquish it to HR/Mr. R. Booker. At 3:10 p.m., today (approximately 2-1/2 hours from my having departed Ludeman), I received a V. M. Msg. from (708) 283-3014, Mr. R. Booker, requesting I return his call. I attempted to locate Kim @ Ludeman to inquire if I have responsibility to return the call, but I could not locate her.

Count 2(b):

**Glenda Corbett, H. R. Director Reginald Booker, and Curt Hastings, ETHICALLY**, should not have had any hand in any of this because I’d made reports to G. C. about R. B. and C. H. and because I’d made reports to OEIG and to DHS Bureau of Civil Affairs about G. C. That is “RAILROADING”/unethical and also against “Whistle Blower” and Retaliation Laws (see document above plus addendums/attachments) **Ludeman Center, Center Director Glenda Corbett Egregiously Breaches DHS Ethics, My Civil Rights, and Retaliation Law and Whistle Blower Law – Glenda Corbett Admitted Unlawful Termination:**

Once out of Fiscal Services/Curt Hastings’ Office and while wrapping up our business, Chief Union Steward Kim stated that yesterday (Thursday, see 6/11/15 above) when she went to confer with Ludeman Center Director Glenda Corbett in regard to (see issue stated above) that Glenda Corbett stated, “I didn’t want to deal with this mess. So I thought it best to just let her (me) go. If she would have told me...” (That is “RAILROADING”/unethical and also against “Whistle Blower” and Retaliation Laws) Kim stopped as if Glenda Corbett stopped. I told Kim to read the document (above). I did tell Glenda Corbett (beginning May 13, 2015) – Aiding and Abetting Discrimination and Harassment **What “Mess” are you referring to if you have no knowledge of having been informed?** (was/should have been the question for Kim to ask G. C. at that point also questioning G. C. that she’d just admitted unlawful termination)

Count 2(c):

**Copy/Paste from 06-05-15 AFSCME Union Grievance** to Union Steward, Steve Dillard and to Chief Union Steward, Kim Brown and as provided to OEIG for my Claim, DHS/DHS BCA for my Claim, and to IDHR/EEOC for my two Charges

Two to three weeks ago, **still in May 2015 (on or around May 13, 2015) and O-T (only opportunity) on Angie C. shift;** I was once again verbally accosted/abused, ridiculed, and unjustly and unfairly accused by Ludeman Center/Ludeman Center **Nursing Supervisors Jackie Boyd and Debbie Helsel** as a result of SLANDER/HOSTILE WORK ENVIRONMENT perpetuated by Switchboard Operator III, Patti Peterson. **I made another notation of this, the same slander/abuse, within the Switchboard Operator Book. I was once again Retaliated against/Harassed by C. Hastings with another and more “serious” letter to me**

stating that I'd been unethical and unprofessional by marking notations (within the book I've been told by P. Peterson is "ours (operators) to make notations/notes to each other and about stuff..." I have also seen/read arguments and attacks unto each other by the other operators) and that he expects professionalism... I commented back that **as a result of Patti P., this:**

**Debbie Helsel and Jackie Boyd once again** called down to Switchboard for an "Emergency Drill Page." Debbie Helsel called down the exact same as she's done so in the past, UNJUSTLY and UNFAIRLY accusatory, belittling, and slanderous of my character and work ethics saying, "Don't call out DRILL... You can't say DRILL..." I, once again was unjustly and unfairly placed on "defense" and/or placed in a position to stick up for myself, my intelligence, my work... etc. so I told her to stop accusing me and calling down to me and speaking to me as if I am stupid. Jackie Boyd called and I told her the same plus I told her that I was quite tired and had enough of the accusations and degradation of me and my character.

A little bit later, **Deon Myles, Glenda Corbett, and Dr. Davis** arrived at Switchboard. I was unaware of who any of them were/are. Deon reminded me of whom he is and spoke to me in the same polite and respectful manner as he'd done previously. I asked him recalled the time he'd told me that people are ignorant and stated that nothing has changed.

**Glenda Corbett** chimed in (I was still unaware of who she was because she did not address me or introduce herself) speaking to Deon Myles while he was attempting to address the "Drill" page and asking for the Operator Manual. However, Deon, though, was overly using "Drill, Drill, Drill" almost to the same accusing magnitude of those who believe me a moron, but I think he was attempting to find out what I knew and understood only having not spoken to me directly about it or asked me, something which should have been done.

I stated to Glenda that Deon is speaking and that I am listening so she would have to wait, which is me respecting myself and those with whom I am carrying on a conversation. Deon said, "Thank you for your courtesy. I appreciate it, but that is the Center Director Glenda Corbett..."

By then Glenda came into the booth and found the Manual and Curt Hastings also showed up.

**Glenda was looking for** the section for Emergency Calls/Pages in order to see if I'd been correct in my telling Debbie Helsel and Jackie Boyd on each occasion that **they accused me of not knowing what I am doing while also accusing me of being stupid** because I'd told them both each time that they called and abused me and slandered my reputation that they are to "Call on the 'Red' Emergency Phone [within the Switchboard Booth] for Emergencies [including drills]." **J. B. and D. H. both** consistently argued me. – Railroad; Aiding & Abetting Harassment and Discrimination

**I saw that G. C. saw the page within the Manual**, when she placed the Manual back, I asked her, "Did you find what you were looking for?" **G. C. replied, "No."**

C. H. approached moments later telling me, **"G. C. would like to speak with you** in her office." **I copied the Manual page (1 page) on "Emergency Calls/Pages"** and took it with me and **presented it to G. C. with (she had) Dr. Osun in attendance** in her office. **She said, retracting, "I saw this in there** (the book)." – Railroad; Aiding & Abetting Harassment and Discrimination

**Glenda Corbett** expressed such things as, "I came down there (Switchboard) because he (Dr. Osun) and I heard your page. You did it exactly right and we heard it clearly. You did not say 'Drill.' We were on House (?) doing some cleaning, which is why I am dressed this way – I usually would not be dressed this way – when we heard the page. We'd just gotten into the car and were driving when we heard the page. We weren't sure if it was a drill so we turned around to go back (to Health Center – to where the Drill was called). When we got there, I heard the way people were talking about you and what they were saying so I can just imagine the type of phone calls that you were getting over there. For you to only be (45/50) days in, you are doing fine. I would be dropping all of the calls and sending them (???) if I were sitting there. That is why I stepped back, and I told them (Deon M./Dr. Davis) to just let you work. I wanted to observe and I wanted them to see what all you all have to do over there. It is a lot. I tell people to go over there and see what you all have to do so that they can see it and understand it,



and I tell them to go see the 'Red' Phone because you are not wrong. It says right here (within the Manual) "Red Phone".... I know that you did not know who I was over there (when she and they all were at the Booth), and I get it. People push and they push too far and you/people have enough so you have to fight/push back (defend yourself). I understand"... Glenda said more and made other comments. She also stated when I reiterated what Deon Myles stated to me about people being ignorant that, "He should not have said that." I said it is true. They are rude and disrespectful to me and they yell. Everyone here yells about everything and nobody wants to help or tell you anything. She said, "I know, but he still should not have said that. Hang in there. We are working on it. It is getting better..." She made other comments. Dr. Osun basically nodded his head in agreement to both G. C. and to me.

**I told Glenda about** how within that very week (Yvonne was on Compliance and I'd informed her), House 44, 46, or 48 (within my notes) had purposely and intentionally hung the phone on a female caller who has a speech impediment and that when I'd informed Yvonne, she had excuses for the House such as, "Maybe they thought someone was playing a joke." I informed Glenda that it is rude, disrespectful, and unprofessional to first of all not listen closely and carefully to persons, especially those with speech impediments, and that it is even more disrespectful, rude, uncourteous, and (while working) unprofessional to dismiss/hang up the call on a person simply because they have an impediment and/or you do not wish to listen to them or try to understand them. I told G. C. that when the caller phoned back and informed me of what happened that I'd reconnected the call(er) while she was on the line and connected (3-way) with me and the House and that when the House picked up, I told them that I have the very caller on the line whom has expressed to me that she'd been hung up on by this House when she was attempting to ask for to whom she'd wished to speak and that it is rude to hang up on persons so once I have disconnected the call from my end, I hope that this House will assist this caller in speaking with whom she wishes..." Glenda Corbett said, "That was very professional of you to do that. Not many people would have the sense of mind or professionalism to do such a thing..."

**I'd also told Glenda the synopsis of the full details of everything listed within this document** because she'd opened with, "I saw an employee about to break, a new-hire who was very upset and I did not like it so I needed to know why and what the situation is..." **So I told her.**

Count 2(c)(1):

**That I fully informed Glenda Corbett is all documented within my 2015 calendar/planner** having begun documenting on 03/16/2015 (my Seniority Date/First Day of Work) and **within the documents that I presented to Glenda Corbett**, and it is documented within my **"Official Complaint" document provided to AFSCME Union/Chief Steward, Kim.**

I followed the protocol of law in having "evidence/proof, building (my) case" as well as the STANDARD AXIOMATIC RULE of U. S. society by DOCUMENTING, DOCUMENTING, DOCUMENTING and by REPORTING. I have a PREPONDERANCE of EVIDENCE and FACTS as well as **WITNESS(s)** being 2<sup>nd</sup> Shift Ludeman Center Switchboard Operator I, Angela Cotton, (Full-Time, long-term) having filed GRIEVANCE(s) against Fiscal Services Director Curtis Hastings involving Pay/Time/Over-Time (EEO violations; Ethics Violations) – **WITNESS(s)** being AFSCME Chief Union Steward, Kim to whom G. C. admitted Unlawful Termination

**I also** (already and/or had been) **followed DHS Ethics protocol per DHS Ethics Officer Robert Grindle** according to his E-Mail (response) to me on Monday, June 8, 2015 in which Rob gave me Ethics advice as to where and/or to whom I should report Harassment and matters of Ethics. I have made those reports.

Glenda Corbett, H. R. Director Reginald Booker, and Curt Hastings, ETHICALLY, should not have had any hand in any of this because I'd made reports to G. C. about R. B. and C. H. and because I'd made reports to OEIG and to DHS Bureau of Civil Affairs about G. C. That is "RAILROADING"/unethical and also against "Whistle Blower" and Retaliation Laws

**"But For"** these disreputable, discriminatory, and unlawful acts to include Breach in HIPAA/Privacy (documented to my DHS/DRS Services Provider), Retaliation (**as admitted by DHS/DDD Ludeman Center Director, Glenda Corbett**), **Whistleblower Act, 740 ILCS 174/1 et seq.**, **Slander and Libel** (as provoked on-the-job and as documented by DHS within its/their "Probation" and Termination Docs), **Hostile Work Environment, Harassment, Bribery, 720 ILCS 5/33-1** (referenced multiple times within my many "supporting evidence" documents as supplied to AFSCME, IDHR/EEOC, DHS DHS/BCA, OEIG), **State Officials and Employees Ethics Act, 5 ILCS 420/et seq.**, misfeasance, malfeasance, and nonfeasance, among others, by official government whose duty is to uphold law and the Civil and Human Rights of American Tax-paying citizens, I would not have been "placed" at DHS/DDD Ludeman Center to have become EGREGIOUSLY HARMED by DHS, DHS/DDD, ALL INCUMBENT, Ludeman Center, by and through and as result of the aforementioned unlawful acts/HARM(s) as well as others, thereby leaving me jobless (at an IL Jobless Rate of 6.0% as of 04/2015), homeless (at an IL Homeless Rate of 11.0%) and without means by which to provide for and to shelter myself, of my own accord.

Count 3(a)(b)(c)(d)(e): (g) **720 ILCS 5/17-1 et. al.**, Deceptive Practice/Joint Culpability  
 (3) 10-02-15 – Sent to IDHR/EEOC; (taken, Copy/Paste from) My Response to DHS/DHS BCA IDHR "Verified Response" (cross-filed with EEOC) for my two Charges; OEIG; DHS/DHS BCA – hand delivered to & date-stamped by IDHR and OEIG; **DHS BCA, Mr. Jerry Post, mocked and condescended to me** and made a mockery of the matter **while refusing to accept my documents as he practically told me that neither IDHR nor OEIG would do anything—"Investigate"/"Find" in my favor:**

Count 3(a):

**RE: DHS BCA APPEAL – DHS BCA Response to IDHR Termination Charge 2016\*\*\*\*\***  
**PREJUDICED AND BIAS on the part of DHS/DHS BCA/Investigator A. Van Hooser & Ms. K. Foy**  
**775 ILCS 5/Art. 1 et al, IL Human Rights Act; 5 ILCS 100/Art. 1 et. al., Illinois Administrative Procedure Act; 5 ILCS 430/ et seq., State Officials and Employees Ethics Act; 735 ILCS 5/1-109; 720 ILCS 5/32-2 et. al., Perjury – Malicious & Reckless Disregard; Negligence per se**

First of All, DHS CANNOT "DENY" that I am a DHS Disability customer and for other DHS services because that FACT is clearly documented throughout the State of Illinois within:

DHS Database (disability services & other)

State Comptroller Office (entitled reimbursement payments to me under my Services Plan)

CMS SDO (Examining/Grading Successful Disabilities Opportunities – Examining Services)

IDHR (has, in their possessing, signed documents by DHS/DRS attesting to my disability)

DHS/DDD Bid for Open Title – I gave A. Chambers, H. R. my CMS SDO Grade (disability)

Secondly, Ms. Annette Van Hooser, Ms. Kimberly Foy, and DHS BCA have/are PREJUDICIAL and BIAS toward me having reported them (all) to OEIG for ETHICS BREACHES and MISCONDUCT. They/DHS CANNOT "Deny" that.

Count 3(b):

Having **Ms. Van Hooser or Ms. Foy or even DHS BCA**, really, anywhere near any investigation having to do with my Charges (all listed above) is further UNETHICAL and is INAPPROPRIATE, UNFAIR, and UNEQUAL. That is worse than the fact that DHS/DDD, Curt Hastings, and Glenda Corbett terminated my employment AFTER THE FACT(S) THAT I'D REPORTED HARM BY MISCONDUCT, BREACHES IN EEO, DISCRIMINATION, RETALIATION, and BREACHES IN WHISTLEBLOWER PROTECTION LAWS.

Count 3(c): "PATTERN" (see Count 4—all, and corresponding Counts)

**Thirdly, DHS BCA Has NEVER INVESTIGATED, in my regard/on my behalf, the Charge (0615R0\*\*\*\*) that I opened on June 11, 2015** with them while in the office of JERRY POST, Supervisor, DHS Bureau of Civil Appeals, 69 West Washington Street, Chicago. While in the office of Mr. Post, I presented him with many pages of documentation. I saw him Scan them unto his computer or a database, and then Mr. Post informed me that he would be assigning my Claim to an Investigator and that it would likely be one in Springfield, IL. (Reported DHS, DHS Recruitment, & DHS BCA to OEIG. OEIG Forward to DHS to invest.)

Copy/Paste directly from the Web Site and Pursuant to State of Illinois Rule, Administrative Procedure, and Law, as well as, federal law:

**IDHS>about DHS>Publications>Brochures>Administrative Brochures: Equal Employment Opportunity - DHS 4172:**

**The Bureau of Civil Affairs**

The duties and responsibilities of the Bureau of Civil Affairs include, but are not limited to the following:

Investigating complaints of discrimination filed **internally** with the Bureau of Civil Affairs, or **externally** with regulatory agencies such as the Illinois Department of Human Rights, the U.S. Equal Employment Opportunity Commission, or the U.S. Department of Health and Human Services, Office of Civil Rights

IDHS/DHS BCA HAD/HAS DUTY AND OBLIGATION TO ME AS THEIR EMPLOYEE AND AS THEIR DISABILITY CUSTOMER. IDHS IS IN BREACH/DERELICTION OF DUTY OF THIS LAW along with OEIG WHO CONSPIRED WITH IDHS TO BREACH THIS AND OTHER LAWS SURROUNDING ME AND MY EMPLOYMENT, MY DISABILITY, AND MY DHS, DHS BCA and OEIG CLAIMS. EACH GOVERNMENT AGENCY, SINGLY, IS CUPABLE OF NEGLIGENCE/per se, INACTION, AND BREACH OF DUTY. TOGETHER, THEY ARE JOINTLY CULPABLE FOR THE SAME AND OTHER APPLICABLE RULES, PROCEDURES, POLICIES, AND LAWS

Count 3(d): Following is Copy/Paste from my "Official Response," submitted to IDHR/EEOC, DHS BCA, OEIG, in response to IDHS, DHS BCA "VERIFIED RESPONSE" (Sworn Statement):

**How can Ms. Van Hooser state within her VERIFIED RESPONSE TO IDHR CHARGE 2016CF\*\*\*\* that she'd/RESPONDENTS NOT RECEIVED INFORMATION? 735 ILCS 5/1-109; 720 ILCS 5/32-2 et. al., Perjury**

Count 3(e):

A letter drafted on July 14, 2015 by one Ms. Kimberly Foy, EEO/AA Officer (as it is clearly reflected Online at DHS BCA on the Web Page for ADA), came in the mail to me only a few days after my having contacted Ms. Van Hooser via E-Mail to, as she requested, submit further information to her for her "Investigation." Also very noteworthy is the fact that **the letter from Ms. Kimberly Foy is dated the very next day after my E-Mail contact with Annette Van Hooser** (I sent detailed information to Ms. Van Hooser on 7/13/15 and on 7/14/15 Ms. Foy sent a letter to me).

**Important:** Ms. Foy's letter written by her in conjunction and cahoots with Ms. Van Hooser to defraud DHS/DHS BCA, State of Illinois, DHS Customers (me), tax-paying citizens (me), and DHS employees/disabled employees (me), is in BREACH of ILLINOIS ETHICS "Truthful Oral and Written Statements" and in BREACH of DHS/DHS BCA POLICIES, RULES, and PROCEDURES. **The letter states:**

"In keeping with '*past practices*,' the Bureau of Civil Affairs will immediately '*administratively*' close your Charge..."

**There were NO POLICIES, PROCEDURES, RULES, or ADMINISTRATIVE CODES stated.** In fact, because DHS BCA and Ms. Foy along with Ms. Van Hooser were all aware, Ms. Van Hooser deceitfully wrote the letter to me intentionally stating "*past practices*" in hopes that I would not be intelligent enough to spot the blatant ETHICS BREACHES, the manipulation and deceit, and the MISCONDUCT by DHS/DHS BCA.

"But For" these disreputable, discriminatory, and unlawful acts to include Malicious & Reckless Disregard, Negligence per se, **PERJURY (720 ILCS 5/32-2, and any other correlating Statutes) BIAS, PREJUDICE, RETALIATION, Whistleblower Act, 740 ILCS 174/1 et seq., Bribery, 720 ILCS 5/33-1** (referenced multiple times within my many "supporting evidence" documents as supplied to AFSCME, IDHR/EEOC, DHS DHS/BCA, OEIG), **State Officials and Employees Ethics Act, 5 ILCS 420/et seq., 5 ILCS 100/Art. 1 et. al., Illinois Administrative Procedure Act**, Human Rights Act along with Federal Laws for employment (U. S. Dept. of Labor, EEOC), misfeasance, malfeasance, and nonfeasance, among others, by official government whose duty is to uphold law and the Civil and Human Rights of American Tax-paying citizens, I would not have been "placed" at DHS/DDD Ludeman Center to have become EGREGIOUSLY HARMED by DHS, DHS/DDD, ALL INCUMBENT, Ludeman Center, by and through and as result of the aforementioned unlawful acts/HARM(s) as well as others, thereby leaving me jobless (at an IL Jobless Rate of 6.0% as of 04/2015), homeless (at an IL Homeless Rate of 11.0%) and without means by which to provide for and to shelter myself, of my own accord.

Count 4(a)(b)(c)(d)(e)(f) GOVERNMENT "PATTERN" & PROVEN BIAS & PREJUDICE

(4) IDHR (along with all other government Civil/Human Rights agencies) FAILS to comply (adhere, abide) with its own/State government Rules, Policies, and Procedures. IDHR, worse still, FAILS TO COMPLY WITH State of Illinois STATUTES/LAWS.

**IDHR has and EEOC has a PATTERN** (and/or Civil- and Human Rights-Upholding Departments – State/Federal – along with other/any/all government agencies):

In or around January of 2016, I removed my two (2) IDHR/EEOC Charges out of the hands/authority of IDHR and strictly into the authority of EEOC. Here is part of the reason why:

Count 4(a):

In previous interactions with IDHR (2012 – 2014 approx.), the **IDHR has PROVEN to be BIAS, unequal, and unfair, lacking objectivity**—lopsided. In other words, **IDHR, along with other similar government Departments is/has NOT been NEUTRAL**; rather IDHR has been strictly for the side of "Big Business" and/or Government.

An outside entity (Watchdog source) being The Leadership Conference: The Nation's Premier Civil & Human Rights Coalition has, too, raised issues of concern as well as proven fact that EEOC and others such as the HUD and subsidiaries (such as IDHR) intentionally tend (lean/side with) toward Respondent and/or "Government/Big Business" rather than the TAX-PAYING little man (American Citizen) that keeps government going and FOR WHO GOVERNMENT WORKS (runs) and also who, as the "small man," would be more in need of the favorable outcome/determination and more deserving and lawfully rightful to have the determination in their favor than Respondent(s)/Government/"Big Business."

**IDHR and other similar government agencies breach PUBLIC TRUST as well as being in mishandling, mismanagement of TAX-PAYER dollar among being DERELICT/BREACH of DUTY, Negligence per se.**

Count 4(b):

I have solid **PROOF, or a PREPONDERANCE of EVIDENCE**, of other State of Illinois Civil/Human Rights-Upholding Departments/Branches/Agencies/Offices that are also as **BIAS, UNEQUAL, UNFAIR and NOT (acting as) a NEUTRAL party** while also scheming, plotting, conspiring, using deceitful practices while being **MISFEASANCE, MALFEASANCE, AND NONFEASANCE toward DUTY to POSITION, JOB, OFFICE, and to TAX-PAYING CITIZENS**. Those agencies include, but are not limited to, IDHS, DHS/BCA and



OEIG/OIG (IL Dept. of Human Svcs., DHS Bureau of Civil Affairs; Office of the Executive Inspect General for Agencies of the Illinois Governor).

Count 4(c):

Ultimately, in essence, inasmuch as, insofar as, whatever; **tax-payers**, often times, and definitely in these matters involving myself, also include being **DISABLED/DISABILITY CUSTOMERS of State Government--DHS/DRS** (Div. of Rehab. Svcs.) as governed under the **Federal Rehabilitation Act of 1973**. As such, among being DERELECT/BREACH of DUTY merely to TAX-PAYING CITIZENS, certain and particular **State government agencies**, by their **actions, INACTIONS**, indubitably, and **CULPABILITY with other agencies – to cover-up, manipulate, and to deceive – are DERELECT/BREACH of DUTY to State of Illinois DISABILITY CUSTOMERS**.

Count 4(d): GOVERNMENT "PATTERN"

(Taken directly from my AFSCME Union Grievance Doc dated 06-05-2015 and amended 06-12-15) **November/December 2014:** (Fraud: Intentional Misrepresentation; Negligent Misrepresentation) In or around the above stated dates and long before I was a State of Illinois employee and well prior to my having even interviewed with Illinois/DHS (at Bureau on Clinton with Sherry Jackson), I was met with **UNLAWFUL acts** against the Disability Act by **CMS** (Illinois Central Management Services) **Testing & Disability Services and CMS Examining**. CMS is guilty of Fraud, actions to commit fraud, trickery, manipulation, and deceit of Illinois citizens (me) and Citizens with Disabilities (me). I reported the matter to OEIG and could have carried it to Federal Court. So if it is your intention to attempt to wad ire me or bamboozle me into believing that Ludeman is not guilty of and has not committed the UNLAWFUL acts that I Factually claim, you need not waste your time. I am very-well aware of the actions and capabilities of State of Illinois Departments, etc.

(The attempts to defraud me – cheat me – Intentional Misrepresentation, a tax-paying disabled citizen and a disability customer of IDHS/DRS, out of (block/keep me from attaining) the highest Grade (A) for the highest State clerical position, Administrative Assistant II, had been in the said unlawful act despite my having received the Grade A, in the previous year, from the exact same Exam while utilizing the exact same criteria, for the Grade and Exam, along with the exact same documents. They even went so far as to misuse and abuse State property/equipment to perpetrate their fraud scheme. They used State computers as well as State/CMS Letterhead to write their documents, those which are **Breach in 5 ILCS 430/ State Officials and Employees Ethics Act, Page 31 "Truthful Oral and Written Statements"** among having broken State and Federal Law under ADA and Rehabilitation Act of 1973. Those who are in question, in these actions against State and Federal Law, are Ms. Jaci DeBrun, Ms. Holly Guppie, and Ms. Darci Hammers. None of who were adversely affected—terminated.)

Count 4(e): EEOC "PATTERN" and GOVERNMENT THREATS, BULLYING, HARASSMENT, ULTIMATUMS, RETALIATION

**42 U.S. Code § 12203 - Prohibition against retaliation and coercion**

EEOC (along with other government Civil- and Human Rights-upholding agencies as documented within this Count 4 section and throughout this documents) FAIL to comply with their own Rules, Policies, and Procedures, and in the specific case of EEOC, they FAIL TO COMPLY (adhere, abide) U. S. C.F.R. and U.S.C

**29 U.S.C. § 701 Rehabilitation Act of 1973 (and as Amended)** -- Neither IDHR, upon "Official" Confirmation that I am, in fact an IDHS/DRS (Div. of Rehab. Svcs.) Disability Customer, informed me of

my Federal Right to Sue within Federal Court under this U.S.C. without/No Necessity to FILE or COMPLETE and IDHR Charge, NOR did EEOC upon sole Jurisdiction of my two Federal (EEOC) Charges.

I was not provided, by EEOC, any documentation of Procedure, Policy, Rule, or Laws.

I was not cited, by EEOC, my Federal Rights.

IDHR and EEOC both FAILED (likely intentionally) to provide me with Federal Law/information pertaining to federal law pursuant to

EEOC has had knowledge of my two (2) IDHR/EEOC Charges since filing in June & July 2015 because IDHR informs that, in the case of my two specific Charges, that IDHR-filed Charges that have "CF or F" within the Charge Numbers are AUTOMATICALLY CROSS-FILED with EEOC thereby also making the Charges EEOC Charges as well and to become IDHR/EEOC Charges. Therefore, EEOC has knowledge of specific Charges as relating/related Federal cases prior to and regardless of whether the Charge Complainant (or I) remove IDHR-filed Charges away from IDHR (State) Jurisdiction and into EEOC (federal) Jurisdiction or not. Still, I did in Dec.2015/Jan.2016. Thus, EEOC had first-hand and specific knowledge of my two (2) Federal Charges beginning and since that time of when I transferred Jurisdiction.

EEOC "SAT" on my two (2) Federal Charges, those which EEOC had knowledge of since Dec.2015 yet no later than Jan.2016, from such time as I solely placed my two (2) Federal Charges into Federal Jurisdiction, yet EEOC failed to contact me. I "chased" all around EEOC from that point up to June 2016. I'd been given the "put-off, delay, runaround" by EEOC having spoken with a multitude of persons (I have their names, dates, and times documented) until Mr. R. S., EEOC Investigator, returned my phone call after one week (plus) that I'd telephoned him upon having been informed of his name by another EEOC Investigator. That ordeal was unnerving at best and the next immediate (following) experience with Mr. R. S. was worse. I documented the entire experience with him within E-Mail that I sent to Mr. R. S. fewer than 5 days later (like 3 days). Part of that E-Mail is Copy/Paste into this E-Mail.

I have supported much of my complaint AGAINST EEOC within this document for previous breaches of EEOC Procedure, etc. by EEOC and as documented within E-Mail to EEOC/investigator (R. S.). However, recent events (08-16-16 – 08-17-16 and continuing pertaining to R. S. has prompted me to include those as well.

EEOC Investigator (R. S.) has issued a THREAT/BULLYING/HARASSMENT/ULTIMATUM to me as a result of my request that I BE properly and thoroughly and lawfully INFORMED, as I believe to be, about Investigator R. S. request that I speak with him. However, that request from EEOC, curiously, came immediately upon E-Mail (08-16-16) of information, LAWS, RULES, etc. and EVIDENCE/PROOF of having PROVEN my IDHR/EEOC (two, 2) Charges by PREPONDERANCE of EVIDENCE to almost and likely is CLEAR and CONVINCING EVIDENCE. Because I'd questioned him regarding his reasons why, at that particular point after I'd just (the day prior) sent him EVIDENCE/PROOF E-Mail that support my two Charges that I have PROVEN both of them pursuant to ILLINOIS PREPONDERANCE of EVIDENCE RULE/LAW and ILLINOIS COURT RULES.

Mr. R. S. sent an expedited E-Mail to me after I'd requested answers as well as having proven my Charges. His E-Mail was THREATENING/BULLYING/HARASSING/ULTIMATUM.

I contacted EEOC Chicago Office and retrieved the name of Mr. R. S.' Supervisor, Ms. D. D. I telephoned Ms. D. D. and informed her that she would receive an E-Mail COMPLAINT (E-Mail Chain that includes Mr. R. S. E-Mail) regarding Mr. R. S. E-Mail and my belief that it is threatening/bullying/harassing/ultimatum. I immediately sent that E-Mail following my brief phone conversation with Ms. D. B. at approximately 10:15 a.m. on 08-17-16. I also put Mr. R. S. name within the "To:" Line of that E-Mail.

Copy/Paste from 08-09-16 E-Mail to EEOC/Mr. R. S., Investigator

Why is/has been U. S. Government, by and through U. S. EEOC, intentionally/purposely delaying its (EEOC) lawful (only lawful) "Finding" in favor of Plaintiff/Complainant?

**I was told**, last year 2015 (or very early this year; I have the evidence) by the IDHS **Interim Secretary, James T. Dimas office**, (I have the documentation/evidence), **that, and I quote, "this matter of these Charges is a legal matter..."** She iterated those words to me upon having first proven and busted out OEIG -- who had/did NOT follow through/do as had been told to me that would be (as I had been informed by OEIG would be the process/next steps/steps already taken) -- by CONFIRMING with/for me that, IN FACT/INDEED, IDHS Secretary Dimas HAD NOT been informed and that my OEIG investigation by the IDHS Secretary Office and/or by/for proper and lawful issuance/doling out by IDHS Secretary Dimas office to DHS/BCA and/or DHS OIG Office(s) for LAWFUL investigation of my FILED and Charge-Number-Issued DHS, DHS/BCA Charges/Complaints HAD NOT BEEN FORWARDED/SENT TO DHS SECRETARY DIMAS' OFFICES AS I HAD BEEN INFORMED, BY OEIG, THAT MY OEIG CHARGE/CLAIM HAD BEEN.

OEIG Charges/Claims HAD NOT been Filed with IDHS Secretary Dimas Office for proper, thorough, and LAWFUL investigation(s) into my DHS, DHS/BCA Charge/Complaint filed with/in the office of Mr. Jerry Post, DHS/BCA at 69 West Washington Street, Chicago, on or about 06-10-15. I had been informed by OEIG that that measure/step(s) had been taken and that the office of IDHS Secretary Dimas would contact me. When and because I'd received no contact from that office, I initiated contact only to learn that DHS Secretary Dimas, and I quote, "Have/had No Record of My (OEIG) Charges/Complaints..." That is upon my insistence along with the fact that Secretary Dimas' office took the entire day on that date to thoroughly search and investigate the matter of OEIG have forwarded or issued, or whatever the processes would have been, my OEIG Charges/Complaints to IDHS Secretary Dimas' Office. Upon that through search/investigation and at the end of the day on that date, I was informed by DHS Secretary Dimas' Office, in regard to my OEIG Claim/Charge, and I quote,

**"I can't find anything. We have NO RECORD of your Claim being sent here... .. This is a LEGAL MATTER any way... .."**

I sent that information and evidence back to OEIG, but I never heard anything back nor did I ever hear anything else, not one word, again from OEIG or from DHS, DHS/BCA.

That is PROVEN EVIDENCE of more/further NEGLIGENCE, NEGLIGENCE PER SE, BREACH IN DUTY, BREACH IN ILLINOIS ETHICS ACT, MISCONDUCT/CONDUCT UNBECOMING, just to list a few, or the breaking for more/further State and Federal Laws by State of Illinois, particularly OEIG.

**I have proven (Civil) Torts, (Civil) Preponderance of Evidence, (Criminal) Elements of/for Negligence, Negligence Per Se, Breach of Contract, Breach of Duty, and so many others.**

This matter of Complaint/Charge must be expeditiously and immediately settled (outcome provided) as it is open/shut in my favor, in the favor of Plaintiff/Complainant

Count4(f): "PATTERN" – RETALIATION, BREACH of DUTY, NEGLIGENCE/Per Se, among others

08-18-16 – Copy/Paste E-Mail Conversation to/with EEOC ENFORCEMENT SUPERVISOR, Ms. Monique DeBusmann

REASONABLE BELIEF of Breach of Federal Law, Breach of Duty to include Retaliation, etc. (see above Count 4(f))

I submitted Complaint to EEOC/Ms. DeBusmann regarding EEOC Investigator Mr. R. S. E-Mail of Threat/Harassment/Bullying/Ultimatum – Copy/Paste excerpts from that E-Mail Chain within this document under Count 4. I'd requested to be informed of my federal rights including my "Right to Know" about which I'd requested to be informed as to why Mr. R. S. had requested to speak with me.

08-18-16 – EEOC Enforcement Supervisor, Ms. DeBusmann RETALIATED by EXPEDITIOUSLY CLOSING my two (2) EEOC (formerly IDHR/EEOC) Discrimination Charges rather than being compliant to my request for information.



Below is the Copy/Paste of part of the E-Mail Chain – Reasonable Belief of Retaliation by EEOC

On Thursday, August 18, 2016 10:25 PM, "dancerindy2001@ > wrote:

EEOC/Ms. Monique DeBusmann,  
<https://www.ada.gov/cguide.htm>  
U.S.C., U. S. Dept. of Justice,  
Disability Rights and Laws,  
Rehabilitation Act, Sec. 504

In accordance to Department of Justice, pursuant to Rehabilitation, Act Sec. 504:  
"It is not necessary to file a complaint with a Federal agency or to receive a "right-to-sue" letter before going to court"

DO NOT DISPUTE ME

THIS (EEOC MISREPRESENTATION, DECEITFUL PRACTICES), ALONG WITH EVERYTHING ELSE INVOLVING EEOC (& IDHR) IS DOCUMENTED WITHIN MY Federal Court Case

Federal Government by and through EEOC is also (now) guilty & has been for/of many BREACHES in LAWS to include:

Willful Intent (to do harm); RECKLESS DISREGARD; Malice/Malicious Intent; Negligence/per se; Joint Liability; Deceitful Practices, MISCONDUCT/UNBECOMING; Breach/DERELICTION of DUTY, etc. and amongst many others INCLUDING UNLAWFUL OMISSION/INTENTIONALLY and/or WILLFUL DISHONESTY (toward U. S. Citizen, U.S. Disabled Citizen. U.S. Disabled Citizen as Charge Complainant with EEOC, to whom EEOC has lied)

EEOC/Ms. DeBussman,

DO NOT FURTHER ARGUE WITH ME.

MY FEDERAL CASE IS DRAFTED and WILL BE AMENDED TO INCLUDE MY "REASONABLE BELIEF" OF RETAILIATION, NEGLIGENCE/PER SE, BREACH OF DUTY, TORTEOUS INTERFERENCE, etc. by EEOC/FEDERAL GOVERNMENT toward U. S. CITEZEN (me) WHOM HAS FILED 2 U. S. EEOC(IDHR, State) CHARGES

EEOC/you should also be aware that I will include this recent E-Mail from you as "Retaliatory Action" on top of the INACTION by EEOC to either:

- 1) Provide me with the LAWFUL REQUEST of INFORMATION that I SOUGHT from EEOC requested by Mr. R. Shelton, Investigator
- 2) PROVIDED DOCUMENTED FEDERAL LAW REASONS as to WHY FEDERAL GOVERNMENT (EEOC) REFUSES to COMPLY (NON-COMPLIANCE) with my REASONABLE, LAWFUL REQUEST for CHARGE(S)--two UPDATE/INFORMATION for my KNOWLEDGE/INFORMATION and as a MATTER OF RIGHTS--EEOC us supposed to UPHOLD CITIZENS' FEDERAL RIGHTS. ALSO, EEOC DENIED MY RIGHT TO MAKE INFORMED DECISION
- 3) EEOC COMMITTED TORTEOUS INTERFERENCE
- 4) EEOC DID NOT CONSIDER THAT I AM A DISABLED CITIZEN (many reasons for importance of that fact--that EEOC DID NOT CONSIDER)
- 5) EEOC COMMITTED/IS NEGLIGENT, NEGLIGENCE PER SE, BREACH OF DUTY
- 6) EEOC opted UNLAWFUL INACTION and/or Negligence and Breach of Duty

This is/will ALL be included/amended to my FEDERAL COURT CASE

Ms. DeBusmann,

My IDHS/DRS Counselor is APRISED of everything and has been from start to finish (March 16, 2015 - Seniority Date with State of Illinois)

**Get this POINT CLEAR -- I DO NOT NEED YOUR PERMISSION TO FILE A CHARGE NOR DO I NEED 90 DAYS**

**U. S. Law, Under REHABILITATION ACT, I DO NOT NEED ANYTHING FROM EEOC TO FILE A FEDERAL CASE within FEDERAL COURT**

PURSUANT TO **EEOC COMPLIANCE MANUAL**, I HAVE GAINED INFORMATION/KNOWLEDGE OF MANY EEOC POLICIES, PROCEDURES, LAWS, ETC. THAT SHOULD HAVE BEEN IMPLEMENTED TOWARD MY EEOC CHARGES--IN FAVOR OF MY TWO IDHR/EEOC CHARGES

A) CHARGE COMPLAINANT DISPUTED UNLAWFUL PRACTICE to "ANYONE" BY INFORMING PERSONS OF UNLAWFUL ACTIONS BY EMPLOYER

1) Charge Complainant (I, me) DISPUTED UNLAWFUL ACTION -- WITHIN EMAIL -- TO MY IDHS/DHS COUNSELOR on or about 03-22-2015 - (I have the E-Mail and so does IDHS by and through my IDHS/DRS Senior Voc. Rehab. Counselor

2) I have saved a copy of the EEOC COMPLIANCE MANUEL along with OTHER regarding EEOC

**MY FEDERAL COURT CASE IS DRAFTED -- EEOC BROKE THE LAW IN DENYING FAIR, EQUAL SERVICE TO ME and by DENYING ME MY RIGHT TO BE PROVIDED WITH FEDERAL EEOC RULES, POLICY, PROCEDURE, LAWS**

**SPECIFICALLY, MY FEDERAL COURT CASE HAS BEEN DRAFTEN BECAUSE EEOC INTENTIONALLY DENIED ME MY RIGHT TO INFORMATION, FROM START (June 2015), THAT I HAD A FEDERAL RIGHT TO HAVE FILED MY FEDERAL CASE WITHIN FEDERAL COURT WITHOUT HAVING EVEN FILED WITH IDHR/EEOC or UPON HAVING INITIALLY FILED (June 2015).**

**THAT INCIDENT/INFORMATION IS INCLUDED WITHIN MY FEDERAL COURT CASE**

1) You/EEOC, by Rule/Regulation you cannot put this information to me sent via E-Mail. Your Office/EEOC HAS NOT supplied me with POLICY, LAW, MY RIGHTS NOR HAVE YOU (EEOC) EXPLAINED YOUR, AGAIN "SO-CALLED" POSITION.

2) EEOC nor IDHS HAS NOT SUBMITTED ANY "PROOF" of THESE CLAIMS.

a) IDHS DISMISSED ME IN A RETAILIATORY MANNER (QUICKLY) -- THEY DID NOT SEEK TO LEARN/FIND OUT ANYTHING ABOUT

MY DHS/DRS Disability Customer "position" (for lack of a word)

3) WITHIN IDHS "VERIFIED RESPONSE" to IDHR (October 2015), IDHS CLAIMS to neither be able to CONFIRM nor DENY my being a DHS/DRS Disability Customer

4) I have already sent E-Mail in June 2016 DISPUTING is FAILED SO-CALLED "Investigation."

Mr. Shelton Spent the ENTIRE (lack of) INVESTIGATION attempting to DISCREDIT ME, MY IDHS/DRS COUNSELOR, and the FACT that I am a IDHS/DRS Disability Customer -- **I HAVE PROOF/EVIDENCE**

**I HAVE INCLUDED ALL EEOC UNLAWFUL INCEDENTS and/or my REASONABLE BELIEF of UNLAWFUL INCIDENTS BY EEOC IN MY FEDERAL COURT CASE.**

EEOC/Ms. DeBusmann,  
**DO NOT FURTHER ARGUE WITH ME**

As I referenced, below, IDHS--all incumbent, WITHING ITS (Legal, Sworn Under Oath, VERIFIED RESPONSE to IDHR) "Swore" to be UNABLE to CONFIRM or DENY that I am an IDHS/DRS Disability Customer.

I HAVE A COPY OF THAT SWORN STATEMENT. THAT SWORN STATEMENT IS ALSO PERJURY -- **735 ILCS 5/1-109; 720 ILCS 5/32-2 et. al.**, Perjury – Malicious Disregard; Breach of Duty; Negligence “

That PERJURIOUS DOCUMENT was DRAFTED/WRITTEN UPON UNLAWFUL PREJUDICE and BIAS upon authors/writers of SAID perjurious document, IDHS (ALL).IDHS/BCA, Ms. Annette VanHooser, Ms. Kimberly Foy, EEO/AA Officer, Mr. Jerry Post, IDHS BCA Supervisor, having been/HAS OEIG COMPLAINTS AGAINST (ALL), from/by me, for MISCONDUCT/CONDUCT UNBECOMING, etc. and many other offense/breaches in State and Federal Laws. **INDISPUTABLE!!**

I HAVE THE PROOF/EVIDENCE

IDHR/(EEOC) for my 2 (two) Discrimination Charges forced 4-page Charge Complainant Questionnaires upon me for BOTH (one each) IDHR/EEOC Charges to which I thoroughly responded with upwards of twenty plus (20+) pages for each/both -- EEOC should have them because IDHR and then EEOC, too, informed me that MY FULL FILE was sent/received to/by EEOC.

I HAVE THE PROOF/EVIDENCE of PREJUDICE and BIAS Claims/Complaints to OEIG against IDHS--all.

The PERJURIOUS "VERIFIED RESPONSE" to IDHR BY IDHS is UNLAWFUL at BEST.

EEOC has threatened/bullied/harassed/ultimatum ME, its FEDERAL Charge Complainant. EEOC then Retaliated as a result/because I made LAWFUL (Rights) "Right to Know" Requests and because I COMPLAINED, pursuant to Federal Law/EEOC, to someone YOU, MS. DeBusmann/EEOC, AGAINST EEOC Threats, etc.

I HAVE THE PROOF/EVIDENCE WITHIN YOUR E-MAIL of RETALIATION/RETALIATORY ACTION because EEOC HAS/DID NOT COMPLY TO MY REQUEST/ANSWER MY QUESTIONS; INSTEAD EEOC CLOSED MY TWO CHARGES.

**I HAVE EEOC DOCUMENT, "COMMON ERRORS BY FEDERAL AGENCIES IN "dismissing" COMPLAINTS of DISCRIMINATION..."** I also have PROVEN, document reports by a REPUTABLE Civil Rights Coalition CHARGING that GOVERNMENT AGENCIES "Have a PATTERN of (unlawfully) DISMISSING CHARGES.

Those are only a couple. There is MULTITUDE. I have proof and evidence of EVERYTHING -- ALL UNLAWFUL ACTIONS BY ALL WITHIN/PARTIES TO THIS/THESE UNLAWFUL EVENTS pertaining to these (IDHR)/EEOC Charges.

08-19-16 – Copy/Paste from E-Mail sent today to EEOC Enforcement Supervisor, Monique DeBusmann  
EEOC

Enforcement Supervisor, Monique DeBusmann:

IMPORTANT State of Illinois CMS Section 504--Rehabilitation Act documentation, RELEVANT to my U. S. EEOC Disability Discrimination Charges as PROOF/EVIDENCE of my Charges -- Illinois Rules of Evidence Rule 401. RELEVANT EVIDENCE -- is as "Attachment," below, to this 08-19-16 E-Mail.

Be advised that everything, every communication between EEOC and me, U. S. EEOC Civil Rights Disability Discrimination Charge Complainant, has been Amended/documented to/within my Federal Court Case, especially that EEOC BREACHED C.F.R. CONFIDENTIALITY by making my Federal (EEOC) Civil Rights Charges "PUBLIC."

I have proven a multitude of EVIDENCE AGAINST EEOC for MULTIPLE BREACHES in U.S.C., C.F.R., Federal Rules, Policies, Procedures, and Laws by the PROVEN FACT that EEOC has BREACHED MY CIVIL RIGHTS FOR/IN HANDLING MY FEDERAL CHARGES by not ABIDING/ADHERING and/or BREACHING LAWS FOR:

SUPREME COURT RULE 201k

Breach/Dereliction of DUTY

Preponderance of EVIDENCE

Rules of Evidence, particularly Rule 401.

Negligence, Negligence Per Se (Statutes)

INACTION (unlawful)

Malicious and Reckless Disregard  
Threats/Bullying/Harassment/Ultimatum  
Retaliation  
EEOC COMPLIANCE MANUAL  
EEOC SEC. 83 DISCLOSURE of INFORMATION -- EEOC made my CONFIDENTIAL information  
PUBLIC  
EEOC document, "Common Errors by Federal Agencies in Dismissing Complaints of Discrimination..."  
etc., so on, and so very many other BREACHES in Laws by U. S. EEOC

As one other PROVEN PIECE OF LAWFUL EVIDENCE -- RELEVANT to Sec. 504--Rehabilitation Act --  
to reflect how/that U. S. EEOC has not followed laws, especially surrounding evidence, is presented here  
as E-Mail Attachment being my "OFFICIAL State of Illinois CMS OPEN COMPETITIVE GRADE" and,  
more particularly to the specifics of my two IDHR/EEOC (sole EEOC Jurisdiction Dec.2015/Jan.2016)  
Disability Discrimination Charges, my "OFFICIAL State of Illinois CMS SDO (Successful Disabilities  
Opportunities) GRADE."

F.Y.I., EEOC (so that you are aware), in case you missed this RELEVANT (Rule 401.) bit of  
INFORMATION/KNOWLEDGE and likely as a result of EEOC Willful INTENT and MALICIOUS and  
RECKLESS DISREGARD,

OPEN COMPETITIVE is just that--open to the civilian/citizen public of Illinois  
SDO is NOT (O C) -- SDO is CORRELATED to/PART OF REHABILITATION ACT  
SDO CUSTOMERS MUST, MUST go through IDHS/DRS for Vocational Rehabilitation Services  
and/or (possibly) similar Rehabilitation Agencies, Disabilities Services

Pay attention to the 2nd Exam Doc., 3rd Line of Title, "Successful Disabilities Opportunities  
(SDO) Program; Score/Grade=SP for Successful Pass (on grey bar). Pay particular attention to "Exam  
Date/Time" to NOTE that this particular **State of Illinois Exam pertaining to Rehabilitation Act/Sec.  
504 is dated 11/18/14 -- PRIOR TO MY State/IDHS Seniority Date/start date**, which is 03/16/15.  
(ATTACHED to E-MAIL)

**DISPUTE ME ON, DISPELL, DISPROVE that EEOC as you have INTENTIONALLY  
been doing since JUNE 2016 and PRIOR** (06-2015 upon initial filing of Federal Charges--IDHR/EEOC)  
once/when EEOC finally decided to acknowledge me/my 2 Charges since Dec.2015/Jan.2016 when I  
transferred jurisdiction to Federal EEOC jurisdiction but EEOC was aware of IDHR/EEOC Federal  
Charges since JUNE 2015 when initially filed. EEOC NEGLECTED/negligence me/my Charges DESPITE  
my having CALLED all over EEOC & IDHR since jurisdiction was transferred. Once EEOC decided to  
RELUCTANTLY communicate with me because I'd informed EEOC that I document every incident (my  
calling, to whom, time, date, said, etc.), EEOC Investigator Robert Shelton INTENTIONALLY and with  
WILFULL, MALICIOUS and RECKLESS DISREGARD, proceeded/conducted "non-investigation" in  
manner to DISPROVE, DISPELL me and my CREDIBILITY along with THAT OF MY IDHS/DRS  
COUNSELOR rather than attempting to gather evidence. EEOC DID NOT "investigate" (non-  
investigation) the UTMOST PRIMARY FACTORS, ISSUES/BASIS(es) of my two CHARGES being that  
State of Illinois, IDHS, DHS/DDD Ludeman Center Director, Glenda Corbett WILFULLY RETALIATED  
AGAINST ME and that GLENDA CORBETT admitted RETALIATION TO law-abiding, Civil Rights-  
upholding, REPUTABLE AFL-CIO LABOR UNION AFSCME UNION Chief Union Steward, Kim Brown, on  
06-11-15 (at time that AFSCME Union/Chief Union Steward, Kim Brown went to "Officially" confer with  
LABOR MANAGEMENT, DHS/DDD DIRECTOR, GLENDA CORBETT, regarding my AFSCME UNION  
GRIEVANCE dated 06-05-15.

I have many other State of Illinois CMS SDO Grades relating to my Disability Services with  
IDHS/DRS that date back to year 2013, minimally.

As I have **DECRIED NUMEROUS TIMES, since March 2015** -- informed IDHS,  
DHS/DDD H. R. Supervisor, Mr. Reginald Booker of my REQUEST for DISABILITY  
ACCOMMODATIONS and as REPORTED/COMPLAINED ABOUT to my IDHS/DRS Disability Counselor  
once "denied" -- to State and Federal Civil/Human Rights-Upholding Agencies,

**I AM VERY MUCH A STATE OF ILLINOIS DHS/DRS DISABILITY CUSTOMER  
STATE OF ILLINOIS and IDHS IS and HAS BEEN FULLY AWARE, FOR MANY  
YEARS, THAT I AM AN IDHS/DRS DISABILITY CUSTOMER**

**STATE OF ILLINOIS, IDHS, DHS BCA, DHS/DDD, DHS BUREAU OF  
RECRUITMENT (UNLAWFUL RECRUITING), OEIG, now U. S. EEOC is in,**



**BREACH OF CONTRACT, BREACH/DERILCTION OF DUTY, VIOLATION OF CIVIL/HUMAN RIGHTS, NEGLIGENCE, JOINT CULPABILITY, NEGLIGENCE PER SE, and many other VIOLATIONS of State and Federal LAWS**

EEOC INTENTIONALLY FAILED to COMPLY with/abide FEDERAL INVESTIGATORY LAW and with EVIDENCE--NEGLIGENCE/PER SE, MALICIOUS and RECKLESS DISREGARD

EEOC INTENTIONALLY FAILED to COMPLY WITH EEOC COMPLIANCE MANUAL-- BREACH IN ETHICS/MISCONDUCT, among others -- EEOC FAILED to CONSIDER DEFENDANT/RESPONDENT USE of "Non-discriminatory reasons," etc. as DIVERSION (whatever the terminology) TO/FOR COVER-UP of the RETALIATORY ACTIONS

PURSUANT to EEOC Investigator exercised "INACTION" pursuant to INVESTIGATION of my Charges

EEOC Investigator

EEOC UNLAWFULLY DISMISSED MY CHARGES WITHOUT LAWFUL INVESTIGATION AND COMPLAINT TO FEDERAL REGULATIONS, CODES, RULES, PROCEDURES, AND LAWS

All Breaches in State and Federal Laws by State and Federal Governments (IDHR, IDHS, DHS BCA, OEIG, EEOC) documented/reported/recorded within my Federal Court Case.

"But For" these disreputable, discriminatory, and unlawful acts to include **misfeasance, malfeasance, and nonfeasance**, among others, by official government, **PARTICULARLY FEDERAL GOVERNMENT/EEOC**, whose duty is to uphold law and the Civil and Human Rights of American Tax-paying citizens, I would not be lacking my bachelor degree (that which I should have—I deserve to hold), I would not be without a job—government job, likely Administrative Assistant II; and I would not be homeless and unable to provide for and house myself.

Count 5(a)(b)(c):

(taken, Copy/Paste, directly from my AFSCME Union Grievance Doc of 06-05-2015 amended 06-12-15)

(5) **Manipulation, Trickery, Dishonesty, Deceit by DHS/Bureau – Unlawful Hiring/Empl. Practices Government Agencies Have a Pattern: FRAUD—Intentional Misrepresentation; Negligent Mis.**

10.4A.1 CIVIL RIGHTS—TITLE VII—"ADVERSE EMPLOYMENT ACTION" IN RETALIATION CASES

**Bid Rigging/Blocking/Tortious Interference by DHS** of my EEO and of State and Federal Law surrounding, "promotion, investigation of other job opportunities," etc. -- *e.g., Dahlia v. Rodriguez*, 735 F.3d 1060, 1078 (9th Cir.2013)(en banc) (involving employee's placement on administrative leave, deprivation of ability to take promotional exam, and loss of pay and opportunities for investigative or other job experience; *Manatt v. Bank of Am., NA*, 339 F.3d 792, 802 (9th Cir.2003) (involving denial of transfer); *Hashimoto v. Dalton*, 118 F.3d 671, 674 (9th Cir.1997) (involving negative job reference)

Count 5(a):

**In or around December 2013/January 2014**

I'd also interviewed with Sherry Jackson for a position at Ludeman Center for the **Office Associate** (I believe) position for which I was offered the job. **I turned down that offer to both Sherry and to Alice Chambers** in Human Resources at Ludeman Center stating to both of them that **I'd not included that/this "Region/Zone" within my "choices" on my application or within the Online Testing documents** that I choose whenever I Test/Exam at the Testing Facility at JRTC. I informed both Sherry and Alice that I'd not been informed of where Ludeman is or distance being in the very far south

suburbs (practically Indiana) and no fewer than 60 miles and 3-4 highways and toll ways from where I live. That is documented at DHS Bureau and likely still at Ludeman.

Count 5(b):

**December 2014/January 2015**

I received a Referral for a location in Park Forest. I believed it to be Forest Park. I interviewed with Sherry Jackson at DHS Bureau office on Clinton in Chicago for the Switchboard Operator 1 position at Ludeman Center.

Sherry Jackson, within my interview, **FAILED to mention (or perhaps she intentionally omitted)** that the position for which I received a Referral to interview is a **Part-Time, Overnight, Weekends position**. It was NOT reflected within the Referral paper(s). It was not until **Sherry Jackson contacted** me almost one month later to **make the job offer did she state**,

**"By the way, I did not know this when I interviewed you. I just found out now, but the position is Part-Time..."** That is manipulation, deceit, and trickery. I was manipulated into this position/job.

**Alice Chambers, once I began training, told me when I stated it to her that, "She (Sherry Jackson) didn't know (that the position is part-time); we told her... there is over-time if you want it..."**

Sherry did not mention to me that she'd interviewed me previously for a position there last year (at that time) nor did she mention where the position is located. I did not realize that the location (Ludeman) was the very same place that I'd rejected last year when I accepted the interview and certainly not considering I'd been inadequately informed within interview (not informed) did I realize it when I accepted the offer of the job. Also, State of Illinois and/or DHS makes it clear that candidates cannot refuse more than three (3) offers, I believe and not for "location/distance," I believe so even though I'd been completely tricked and bamboozled into the interview and the offer of the position, primarily because as I understand, it is difficult to staff Ludeman Center, **I accepted the position under manipulative stress/duress/coercion (of being hired/getting a job).**

**FRAUD: Intentional Misrepresentation; Negligent Mis.** – false representation of fact; knowledge or belief that the information is false; intent to induce the candidate to accept the job; causing the candidate to accept the job; and damage (injury) to the candidate by accepting the job

Count 5(c):

**May 2015**

I had an interview as a result of Referral from/with DHS Bureau on Clinton in Downtown Chicago. I'd previously been informed while on interview/Referral with HFS prior to being hired for current position that "If there are 'inside' (State employees) candidates interested in a position, we cannot go outside (Referrals). We must consider State employees first and if possible (if there were State candidates), hire employees first..." When I received that Referral, I was, obviously, already an employee. It is possible and probable that somewhere along the lines between CMS and DHS the paperwork, etc. got crossed; however, I was an inside candidate and considering the circumstances (Referral), likely the only one. **I was not made an offer** for that position so **I question why**. Did Ludeman/Fiscal Services receive inquiries that they gave unflattering, forward progress/Upward Mobility-impeding comments to? If not, what? It is my understanding that as a (already) State employee, I was supposed to be/should have been offered that position, especially considering the circumstances of by likely being the only State candidate that was Referred.

**"But For"** these disreputable, discriminatory, and unlawful acts to include misfeasance, malfeasance, and nonfeasance, **10.4A.1 CIVIL RIGHTS—TITLE VII—"ADVERSE EMPLOYMENT ACTION" IN RETALIATION CASES, 720 ILCS 5/17-1 et. al, DECEPTIVE PRACTICES (hiring/employment), Tortious Interference**, and among others, by official government whose duty is to uphold law and the Civil and



Human Rights of American Tax-paying citizens, I would not have been "placed" (unlawfully being I was manipulated and placed under duress of the thought of employment, among others) at DHS/DDD Ludeman Center. Therefore, I would not have been nor could I have been placed in such an egregiously heinous and unlawful situation by and through IDHS—all incumbent. I would have been "Referred/Bid" out of my Title and away from DHS/DDD and within rational, reasonable driving distance. DHS Bureau of Recruitment is culpable by and through the unlawful acts/actions of/being unlawful hiring practices.

Count 6:

**Week of March 16, 2015**

March 16<sup>th</sup> - New-Hire Employee Seniority Date – I began Training in Training Building

March 18<sup>th</sup> – 1<sup>st</sup> Day of Training at Switchboard with Patti Peterson, Operator III

On or about, I went to Admin. Bldg. 60 to seek the Reasonable Accommodations form from Reginald Booker, Dir. of H. R. (I'd been told by Alice Chambers in H. R. when I'd gone to Ludeman weeks earlier to do paperwork/Background Check & Drug Testing that the person from whom to get the form was not in and that I could get in once I started training. That is why within my 1<sup>st</sup> week I sought the form. I'd gone to Bldg. 60 on my 1<sup>st</sup> day and 2<sup>nd</sup> day to retrieve the form but was told that "he's" not in—Mr. Booker). **I asked Mr. Booker for the Reasonable Accommodations form, and this is the response that I got in a very off-putting, "how dare you make such a request" tone and way:**

"Did you know before you started that you required accommodations? Did you ask for accommodations in your interview? Did they know when they interviewed you that you are disabled? Why are you asking for accommodations now...?" Mr. Booker was unwelcoming and harsh.

I responded, "I do not know in what manner Bureau (DHS office on Clinton in Downtown Chicago) came about acquiring a Referral for me. I have Grades in Open-Competitive as well as in SDO. They do not tell you (persons, me) what Referral they have/from where they got it so I do not know. But I am asking you now, as I was informed I could."

Mr. Booker told me that he could not locate the document and that he would send it over to me. He, obviously, gave it to Rhoda in Human Resource who then gave the document to someone, a male, who to this day I cannot recognize or place, and who then gave the forms to the wrong person. He gave them to Patti Peterson all OPEN, NOT ENCLOSED IN AN ENVELOPE OR EVEN FOLDED.

Patti Peterson looked at the forms and then gave them to me. Patti, only seconds later, then picked up the phone and she called Rhoda who then both began to Breach HIPAA, Ethics, and whatever else and also spreading personal and confidential information through CONFLICT-CAUSE Gossip stating,

"I don't know what accommodations she could want. What could she ask for? There are no accommodations..."

I immediately excused myself from the booth and went directly to bldg.60 and straight to Mr. Booker's office where I then told him,

"We just had HIPAA training. You just breached my confidentiality by sending confidential documents to me open and for anyone and all to see. You gave them to Rhoda who did not regard privacy or confidentiality. Rhoda gave them to some guy to take to me, but he had no idea who I am so he gave them to Patti. Patti received them and she then picked up the phone and immediately called Rhoda and they both began gossiping about me and my accommodations or need for. That is none of their business or concern. Also, Rhoda is in H. R. She breached confidentiality and she spread gossip and conflict by discussing my matters with others who had no business even knowing but who found out because there was no protocol for privacy and confidentiality followed. I am very upset about this."

Mr. Booker responded, "You're right. I'll talk to her (Rhoda)..." Mr. Booker was guiltiest because the entire ordeal was his was for him to follow through from start to finish and to make certain was properly handled. Alice did not tell me to "See Rhoda" or that "Rhoda has or can get the forms." Alice told me to see Reginald Booker, and he is who I saw about the forms.

Reginald Booker, Director, Human Resources, and I had a meeting, and the conversation was documented that session within my calendar on that date, and I also provided Ms. Corbett with evidence

I was appalled and so very distraught by the very notion of it all that on that very day (03/16), I contacted my service provider (DHS/DRS) to inform her of the horrendous, horrific ordeal. She was, of course, more appalled than I was and still am. Breaches: HIPAA; Ethics; ADA; Rehabilitation Act; (Human Rights) Civil Rights (Federal & State)

"But for" those/these egregious Breaches in HIPAA, Rehabilitation Act, ADA, and my Civil/Human Rights as governed under State and Federal Law as well as Breach(es) of DUTY and CONTRACT to me as an employee of State government (as funded by Federal monies), an employee protected by State and Federal Discrimination Laws, particularly those for disability, and as a State of Illinois Disability Customer of IDHS/DRS, my Rights would not have been withheld thereby lending to my not receiving REASONABLE ACCOMMODATIONS and/or the RIGHT to request Reasonable Accommodations and/or the Right to seek to Request lawful forms/docs. in an effort to seek to request Reasonable Accommodations and/or professional information from professionals informed and lawfully able to provide information to me pertaining to requesting and/or seeking to request Reasonable Accommodations – "but for" these/those unlawful acts/actions among/along with others, I would not be jobless/unemployed, homeless, and unable to provide for myself of my own accord.

Count 7(a)(b)(c)(d)(e): "PATTERN" – (Copy/Paste directly from 06-05-16 E-Mail to EEOC/Investigator R. S. as a reply/follow-up and question/inquiry into what I strongly believe to have been/be a debacle/sham, unfair, completely biased, and not neutral (so-called) "investigation" (his telephone call to me on 06-02-16 @ 1:56 p.m.) into what should have been both of my (2) IDHR/EEOC Charges but was lopsided tending toward only one while omitting any inquiry/"investigation" into the IDHR/EEOC Termination Charge. The "investigation" also tended, biasedly, toward IDHS. I have retained the E-Mail.

"PATTERN" – (Count 7(e): Copy/Paste directly from 08-9-16 Follow-Up E-Mail to EEOC/Investigator R. Shelton as a result of zero (none) communication and/or information from EEOC/Investigator Shelton since the 06-02-16 EEOC (non) investigation into my Charges (see 06-05 Ref.)).

(7) I have been pondering your call to me for inquisition into your/EEOC (I think) "investigation" of my two Charges that you made to me at approximately 2:00 p.m. on Thursday, June 2, 2016.

I have been bothered by some of your statements to me, inquiries, and lack of inquiries thereof concerning my two discrimination charges. Also, you never even inquired as to anything referring to the IDHR/EEOC Termination Charge of July of 2015.

You have the "official paperwork" sent via USPS Mail directly from IDHR to DHS/DRS, Arlington Heights Office for Ms. Janet Harris to fill-out and to sign and date, which she did. Yet, Mr. Shelton, you question it and you questioned me regarding it. If you have doubts and/or, as I suspect, you/EEOC are attempting, as is/was IDHR/State of Illinois (DHS, DHS/BCA, OIEG, all), to disprove, dispel, and discredit me and my complaints/Charges and to make me, my witness(s), particularly DHS/DRS Sr. Voc. Rehab. Counselor, Ms. Harris, somehow incompetent, untrustworthy, unreliable, or lacking credibility...

You did not "investigate" at all anything to do with my unlawful termination--nothing; not one inquiry. You didn't ask about the meeting that I had (at Glenda Corbett's demand because she was looking, then, to attempt to retaliate and fire me because of my accusations--see the AFSCME Grievance Document dated June 5, 2015) "on or around May 16, 2015" in which at which time I informed Glenda Corbett of all and everything to that point that had been transpiring and transgressed against me by Ludeman H. R. (Reginald Booker & Rhoda), Fiscal Services, Mr. Curtis Hastings, and his cohort Ms. Patti Peterson. I documented that session within my calendar on that date, and I also provided Ms. Corbett with evidence

that completely dispels, disproves, and negates her (then) harassment along with her attempt at/to begin a negative paper trail. Again, see the AFSCME Union Grievance document that I provided to both union steward, Steve Dillard (06-05-15) and to Chief Union Steward, Kim Brown (06-10-15)...

So back to what has been troubling me. I asked you and reminded you about both (2) IDHR/EEOC Charges while also informing you that upon my two (IDHR/EEOC) Charges is stated that Illinois Department of Human Services is the "Defendant" and not merely one division and/or singular/single and/or specific persons. I'd been apt to do so because of your inquiries that seemed to ONLY suggest that and to pose inquiry that/about/into ONLY DHS/DDD (Ludeman) and Mr. (Curt) Hastings whom you were most adamant about inquiring. You barely referenced the DHS/DDD Director, Glenda Corbett nor did you make mention of, reference, or inquire about the IDHR/EEOC Charge of Termination upon which Ms. Glenda Corbett is most specifically accused for (unlawful) Retaliation and for Breach of/to/in Whistle Blower Protection Act...

Count 7(a):

**EEOC/Mr. R. S.**, also regarding DHS, DHS/BCA, OEIG & OIG, as stated within my IDHR/EEOC Response to the DHS, DHS/BCA IDHR/EEOC "Verified Response" to my 2016\*\*\*\*\* ("Termination" July 2016) Charge (July 2016) -- that which when I questioned you as to whether or not you have received it from IDHR because it is important and it is my Response to their (DHS) "Verified Response" -- where Ms. **Annette VanHooser "PERJURED" (or something) herself and is PREJUDICE and BIAS** along with DHS (all incumbent) and to which I'd reported that I am aware of **BLATANT MISCONDUCT, NEGLIGENCE**, and likely unlawful negligence (crime) BY DHS to include DEATH (of customers/patients) and COVER-UP by DHS and OIG/OEIG thereof...

(b) and also that **OEIG along with DHS & DHS/BCA are CULPABLE by and through "INACTION" (negligence, dereliction and/or breach of DUTY)** in that neither DHS/BCA nor OEIG adhered to and abided State of Illinois Law by having NOT investigated my Charges at/to/with both government investigatory/investigative agencies (DHS/BCA & OEIG) as well as that OEIG DID NOT ENFORCE RULE or LAW unto/upon DHS/BCA to investigate, rather OEIG simply continued to return uninvestigated Complaints (back) to DHS/BCA and that OEIG neither took control to investigate my DHS/BCA Charges nor did OEIG investigate my OEIG Charges/Complaints. To that, I would also like to state and add, as evidence, that I am also aware of many discrimination/disability lawsuits against DHS whether either pending, appealed, or concluded/settled in some manner. I also have further evidence corroborating/proving THESE FACTS among/along with others that I have.

(c) State of Illinois, specifically Illinois Department of Human Services, broke the law (many). There is no question and it is FACT and it is indisputable. Civil and Human Rights-upholding and governing government agencies as and including **DHS/BCA along with OEIG conspired in cahoots** (I have proof and evidence) to break law by/to not investigate my individual Charges/Claims at/in each State agency **making each singly and together BREACH in DUTY, NEGLECT, and culpable by and through MISCONDUCT and INACTION.**

(d) They (State of Illinois, IDHS--all incumbent) **breached DUTY and CONTRACT to me** as their **disability customer** (for/in/during the past years -- including and especially during the time of my State and DHS, DHS/DDD employment -- and on-going to date and beyond) **on top of being/having been their employee**--03/16/15 - 07-12-15, approximately. They denied me lawful services under the Rehabilitation Act of 1973 as well as the ADA. They created a **HOSTILE WORK ENVIRONMENT. They TAUNTED & HARASSED me.** They ignored my (DOCUMENTED) pleas for aid and assistance--HELP. They

committed FRAUD of lawful Time/Pay/Payroll/O-T and they used those this as a source of "bribery/coercion" and FRAUD to keep me quiet. When I was not "silenced" and upheld my moral, civic, and ETHICAL DUTY to REPORT (upon having documented, documented, documented) pursuant to IL Statute 5 ILCS 430/1 et. seq. (State Officials and Employees Ethics Act), State of Illinois DHS BREACHED 740 ILCS 174/5 et. al.--WHISTLE BLOWER ACT by/through unlawfully retaliating many times and in many ways (I have it documented along with having evidence) while I was on-the-job. IDHS then unlawfully retaliated with an unlawful un-paid suspension. Next IDHS retaliated with/by unlawful termination. IDHS, then, openly admitted blatant breach of DUTY, NEGLECT, Whistle Blower, unlawful suspension and termination as well as Retaliation by and through the admission by DHS/DDD Ludeman Center Director, Ms. Glenda Corbett's admission to the lawful, governed, and ethics-abiding Labor Union, AFSCME, and the DHS/DDD AFSCME Chief Union Steward, Ms. Kim Brown on 06-12-15, (date error corrected to 06-11-12 today on 07-18-16 by author) stating that per Ms. Corbett, "I didn't want to deal with this 'MESS' so I thought it best just to let her (me, I) go..."

(e) Why is/has been U. S. Government, by and through U. S. EEOC, intentionally/purposely delaying its (EEOC) lawful (only lawful) "Finding" in favor of Plaintiff/Complainant?

I was told, last year 2015 (or very early this year; I have the evidence) by the IDHS Interim Secretary, James T. Dimas office, (I have the documentation/evidence), that, and I quote, "this matter of these Charges is a legal matter..." She iterated those words to me upon having first proven and busted out OEIG -- who had/did NOT follow through/do as had been told to me that would be (as I had been informed by OEIG would be the process/next steps/steps already taken) -- by CONFIRMING with/for me that, IN FACT/INDEED, IDHS Secretary Dimas HAD NOT been informed and that my OEIG investigation by the IDHS Secretary Office and/or by/for proper and lawful issuance/doling out by IDHS Secretary Dimas office to DHS/BCA and/or DHS OIG Office(s) for LAWFUL investigation of my FILED and Charge-Number-Issued DHS, DHS/BCA Charges/Complaints HAD NOT BEEN FORWARDED/SENT TO DHS SECRETARY DIMAS' OFFICES AS I HAD BEEN INFORMED, BY OEIG, THAT MY OEIG CHARGE/CLAIM HAD BEEN.

OEIG Charges/Claims HAD NOT been Filed with IDHS Secretary Dimas Office for proper, thorough, and LAWFUL investigation(s) into my DHS, DHS/BCA Charge/Complaint filed with/in the office of Mr. Jerry Post, DHS/BCA at 69 West Washington Street, Chicago, on or about 06-10-15. I had been informed by OEIG that that measure/step(s) had been taken and that the office of IDHS Secretary Dimas would contact me. When and because I'd received no contact from that office, I initiated contact only to learn that DHS Secretary Dimas, and I quote, "Have/had No Record of My (OEIG) Charges/Complaints..." That is upon my insistence along with the fact that Secretary Dimas' office took the entire day on that date to thoroughly search and investigate the matter of OEIG have forwarded or issued, or whatever the processes would have been, my OEIG Charges/Complaints to IDHS Secretary Dimas' Office. Upon that through search/investigation and at the end of the day on that date, I was informed by DHS Secretary Dimas' Office, in regard to my OEIG Claim/Charge, and I quote,

"I can't find anything. We have NO RECORD of your Claim being sent here... .. This is a LEGAL MATTER any way.... .."

I sent that information and evidence back to OEIG, but I never heard anything back nor did I ever hear anything else, not one word, again from OEIG or from DHS, DHS/BCA.

That is PROVEN EVIDENCE of more/further NEGLIGENCE, NEGLIGENCE PER SE, BREACH IN DUTY, BREACH IN ILLINOIS ETHICS ACT, MISCONDUCT/CONDUCT UNBECOMING, just to list a few, or the breaking for more/further State and Federal Laws by State of Illinois, particularly OEIG.



I have proven (Civil) Torts, (Civil) Preponderance of Evidence, (Criminal) Elements of/for Negligence, Negligence Per Se, Breach of Contract, Breach of Duty, and so many others.

"But For" these Malicious and Reckless acts in Disregard of Negligence/per se, Misconduct, Conduct Unbecoming, Breaches in State and Federal Law, manipulation, trickery, deceitful practices, misfeasance, malfeasance, nonfeasance, to include but not limited to Breaches in State Rule, Policy, and Procedure (**5 ILCS 100/Art. 1 et. al., Illinois Administrative Procedure Act** among other correlating laws, policies, etc.) as well as and including Breaches in Federal Procedure and Policy of/by EEOC as documented in EEOC COMPLIANCE MANUEL, I would not be jobless/unemployed, homeless, and lacking the ability to provide for/to my good health and a decent home along with entertainment monies for sound, full, holistic health, etc. U. S. EEOC has duty to uphold federal law; however, EEOC is/has been manipulating me and my case (EEOC 01/2016), as did IDHR, DHS/DHS BCA, OEIG, for the mere facts that I am Pro Se and that government Human and Civil Rights Agencies/Departments have a PATTERN.

Count 8(a)(b)(c):

(8) **10.4A.1 CIVIL RIGHTS—TITLE VII—"ADVERSE EMPLOYMENT ACTION" IN RETALIATION CASES Bid Rigging/Blocking/Tortious Interference by DHS** of my EEO and of State and Federal Law surrounding, "promotion, investigation of other job opportunities," etc. — e.g., *Dahlia v. Rodriguez*, 735 F.3d 1060, 1078 (9th Cir.2013)(en banc) (involving employee's placement on administrative leave, deprivation of ability to take promotional exam, and loss of pay and opportunities for investigative or other job experience; *Manatt v. Bank of Am., NA*, 339 F.3d 792, 802 (9th Cir.2003) (involving denial of transfer); *Hashimoto v. Dalton*, 118 F.3d 671, 674 (9th Cir.1997) (involving negative job reference)

(a) Copy/Paste from my Responses to both (2) IDHR/EEOC Claimant/Charge Questionnaires of June and July of 2015—Unlawful Suspension; Unlawful Termination

**10.4A.1 CIVIL RIGHTS—TITLE VII—"ADVERSE EMPLOYMENT ACTION" IN RETALIATION CASES**

... .. I EXPECT my opportunities, FORWARD PROGRESS, UPWARD MOBILITY, FUTURE, and BIDS within STATE OF ILLINOIS NOT to be BLOCKED or INTERFERED with by DHS or DHS/DDD Ludeman or State of Illinois. In or around late April/early May 2015, I'd placed a Bid with DHS/DDD Ludeman with Alice Chambers, DHS/DDD Ludeman Center Human Resources Representative. I'd sent Alice my SDO (Successful Disabilities Opportunities) Grade for that Bid so DHS/DDD Ludeman cannot deny being informed/knowledgeable of my Disability (on top of which I am in the DHS system for receiving DHS/DRS services). I never heard from DHS/DDD Ludeman/ H. R./Alice Chambers about my Bid for the open position. Also, I strongly believe that another Interview/Referral I'd gone on in May with DHS Bureau Recruitment on Clinton in Chicago for a higher ranking Title/position – (Rehabilitation Case Coordinator) with DHS/DRS in Elgin, IL (10 minutes from my home) – was BLOCKED/INTERFERED with by DHS/DDD Ludeman because of the circumstances surrounding the Interview/Referral (see my 14-page document). I reported that matter to DHS Bureau of Civil Affairs and to OEIG...

(b) **10.4A.1 CIVIL RIGHTS—TITLE VII—"ADVERSE EMPLOYMENT ACTION" IN RETALIATION CASES**  
... .. **Ludeman Center H. R. Rep., Alice Chambers; 114 N. Orchard, Park Forest, (708) \*\*\*-\*\*\*\***

(see my opening) - Not only is Alice Chambers very knowledgeable of the fact that one year previously (February/March 2014) to Unethically/Misconduct being Referred/Interviewed for and under manipulative duress and stress accepting the Ludeman position this year 03/16/2015, I turned down a Full-Time position at Ludeman for a higher ranking Title because Ludeman Center 's ZONE/REGION is NOT listed/indicated/acceptable/reflected on/within my CMS100 or within the Title Testings (computer)

at the JRTC Examining facility. In 2014 I told both Alice Chambers and the hiring manager at DHS Bureau, Sherry Jackson, that Ludeman is NOT indicated on my CMS100 nor in my Examining information and that Ludeman is 60 miles from my house so I cannot accept the offer. Check DHS Bureau Paperwork and DHS/DDD H. R. paperwork. It should be on file at both. And check CMS Testing/Examining systems/records. It should be recorded/document & on file. I also retain copies of my CMS100(s) and my Referral(s). So why, I wonder/ask/inquire, would DHS Bureau/Sherry Jackson Unethically place me in the same/similar position once again and only one year later to interview for/be offered a position at the very same location that I'd rejected knowing (Bureau/Ms. Jackson) full well that according to State and/or DHS policy candidates cannot reject more than 3 (three) offers lest they be removed from the List. That UNETHICAL is master manipulation, deceit, duress and UNDUE HARM/STRESS placed upon me to not only have to consider once again an offer that I'd stressed over rejecting just one year prior but to then have to accept an offer of a P-T position in the very same location that I rejected, which is 60 miles and 3-4 tollways and highways away from where I live placing me more in a bind of financial affordability, distance/traveling safety (particularly in winter/inclement weather months), and simply too far to drive daily back and forth (120 miles approx.) daily or even all weekend long for my part-time shift. Driving 120 miles round-trip on 3-4 tollways and highways for a mediocre-paying job whether full-time or part-time (which mine at this time is P-T) is completely unreasonable. **I reported those UNETHICAL ACTS to DHS Bureau of Civil Affairs and to OEIG.**

I question why DHS Bureau/Sherry Jackson would place me twice in that position. I have Grades/Exams in both CMS Open Competitive and Successful Disabilities Opportunities (SDO). It has come to my knowledge that often times employers/hiring personnel will place who they feel to be "lower standard" or not deserving of higher pay and/or better work and working conditions, especially **including DISABLED persons** such as I, in positions/Titles/jobs and locations that they deem the applicant/employee ("ONLY") deserve. **I reported that inquisition to DHS Bureau of Civil Affairs and to OEIG...**

(c) Further documentation of Breaches of 10.4A.1 CIVIL RIGHTS—TITLE VII—"ADVERSE EMPLOYMENT ACTION" IN RETALIATION CASES—surrounding CMS Referrals (Bid & Referral Blocking/Interference) to me and my BIDDING on Open Titles (Bids) = Bid Blocking/Interference—by State of Illinois (DHS, DHS BCA, OEIG, CMS, IDHR as previous, et. al.)—is documented within my correspondence/communication of E-Mail with/to DHS BCA Investigator, Ms. Annette VanHooser, who, along with Ms. Kim Foy, Mr. Jerry Post, and all of DHS, DHS BCA, has been documented by me within this document as well as within OEIG Complaints/Charges for Breaches in Illinois Employee Ethics, among other including Breaches in State Rule, Policy, Procedure, and law plus breaches in Federal law surrounding me, my disability/status, Rehabilitation Act of 1973, my being a disability customer of DHS/DRS (Division of Rehabilitation Services/Voc. Rehab.), my employment, my Charges (all—IDHR/EEOC, DHS BCA, OEIG), etc. I have sent my documentation of Bid Interference/Blocking that was made to DHS, DHS BCA and the DHS BCA Investigator, Ms. VanHooser, along to IDHR/EEOC and to OEIG for investigation. My Charges/Claims/Complaints have never been investigated. DHS, DHS BCA, all, but to especially include Ms. VanHooser, has also been reported, by me, to OEIG and to IDHR, and as well, I'd attempted to also report the matter to Mr. Jerry Post of DHS BCA at 69 West Washington Street, Chicago, for PREJUDICE, BIAS, and PERJURY, among others, within the DHS, DHS BCA (all incumbent) IDHR/EEOC "VERIFIED RESPONSE" to my Charge(s). Mr. Post mocked, condescended to, and ridiculed me practically and basically telling me that my Charges would not/never be investigated by IDHR or OEIG. By January of 2016 upon my removal of my (2) IDHR/EEOC Charges away from IDHR and solely to EEOC (EEOC is also failing to lawfully investigate my Charges), my (2) IDHR/EEOC Charges had never been investigated nor had they even been assigned to an investigator—I'd gone to the IDHR office at JRTC several times to check/investigate while dropping of many documents of proof and evidence—



Preponderance of Evidence. My DHS/BCA Charges, per evidence to the fact including the own words of Mr. Jerry Post, have never been investigated and were unlawfully closed without investigation. My multiple OEIG Charges and Amended Charges surrounding all said matter were/have never been investigated—not by OEIG and certainly not by DHS, DHS/BCA.

“But for” these Tortious Actions including Tortious Interference, Negligence, Negligence per se, Malicious and Reckless Disregard, among others, I would be away from DHS/DDD and likely away from DHS altogether because I’d also gone on (CMS) Referral Interviews with other State agencies while still employed with State of Illinois/IDHS; but for Negligence/per se, Tortious Interference, among others, that include the unlawful Retaliation of Suspension and then unlawful Termination by DHS, I would likely have been chosen for one of the several Referral interviews I’d gone on that are outside of DHS prior to being unlawfully suspended and while on/during unlawful suspension. But for Tortious Interference, Unlawful Retaliation, Malicious and Reckless Disregard by, among other breached laws, I was still be employed, I would likely be employed by a different State agency/department, I would not be unemployed and homeless and suffering the physical manifestations of stress, anxiety, and so forth.

**Prayer for Relief:**

WHEREFORE, the Plaintiff, LETRA BLEDSOE, prays for a judgment in her favor and against the Defendant(s), ILLINOIS DEPARTMENT OF HUMAN SERVICES, OEIG, and all State agencies culpable in joint liability – State of Illinois, to include IDHS—all incumbent, OEIG, CMS (and IDHR), has erroneously aggrieved me as a State of Illinois CMS SDO Customer (Rehabilitation Act), DHS Customer, particularly being a DHS/DRS (Div. of Rehab. Svcs.) Disability Customer (Rehabilitation Act), as well as, previously and simultaneously having been a State of Illinois DHS employee and having been governed under a Protected Class governed by State and Federal Law to include the Rehabilitation Act of 1973 and the ADA; and whereas State of Illinois DHS—all incumbent is liable for many and multiple breaches in State and Federal laws insomuch as being jointly culpable with OEIG (CMS, IDHR) to conspire in cahoots to further breach many and multiple State and Federal laws against a tax-paying citizen of the United States and of Illinois (me)— as well as being a tax-paying disabled citizen and disability customer of State of Illinois – to include acts against Rehabilitation Act, 10.4A.1 CIVIL RIGHTS—TITLE VII—“ADVERSE EMPLOYMENT ACTION” IN RETALIATION CASES, Whistle Protection Act, Employee Ethics Act, as well as acts of Deceptive Practice, BIAS, PREJUDICE, PERJURY to list just a few; and whereas these most heinous act/actions against the U. S. Constitution toward a moral, civic-minded, law-abiding, tax-paying disabled citizen has so adversely harmed me that I have been unemployed since the actions of unlawful suspension followed by unlawful termination thereby rendering me homeless since these unlawful actions against me, a disabled citizen, were perpetrated – For hardship, expenses, loss of wages, income, job, employment, for the slander and libel, and for all harms as documented and stated, I respectfully request that this Honorable Court grant judgment in my favor and my prayer for relief as outlined:

- 1) I expect to “Be Made Whole as if these issues have never taken place”
- 2) I expect to be placed out of DHS/DDD Ludeman away from ridicule, insults, stares, harassment, etc.
- 3) I expect to be placed into a full-time position and Title of my choosing/choice
- 4) I expect to be provided with the Title and opportunity, which CMS Grading/Testing in Springfield attempted to defraud and rob (cheat) me of, in manners that breach Rehabilitation Act and ADA, being Administrative Assistant II. I have the Grade A that CMS attempted to defraud/steal/cheat me out of, and I have earned/am deserving of Grade A for Title Administrative Assistant II. I will also accept

Paralegal and/or Paralegal Assistant and/or Legal Assistant and/or Legal Secretary. I will strongly consider the highest level Secretary Title for which I have a Grade/Exam. Prefer Paralegal/legal.

4a) My preference is to work within the IL Attorney General Office within the legal Titles mentioned

4b) I expect to be placed in an accessible and very reasonable location to distance, travel, and expenses of gas, tolls, and car maintenance and/or public transportation. I expect to be placed Downtown; hence, Illinois Attorney General Office or in a location within the Downtown/Near West/Mag Mile, N. Mich. Ave./Loop region—walking distance from Metra or convenience of CTA in/around Downtown without more than a few – 10 extra minutes of travel (not another one-half-hour and more once Downtown—that would be outside of Downtown). Region/Area/Location TBD by Plaintiff/me

5) I expect full back-pay with interest and the amount of over-time I would have and could have earned

6) I expect my opportunities, including Titles/Exams, Forward Progress, Upward Mobility, Future, Bids, etc. within State of Illinois not to be blocked or interfered with by DHS, DHS/DDD or State of Illinois in any manner, including CMS, OEIG, and/or other branches of Illinois or federal government

6a) I expect for all of my Grades/Exams/Tests/Titles to be reinstated and with full one-year expiration from the point of reinstatement

6b) I expect my Seniority Date to be reinstated (03-16-15) with full entitlement

6c) I expect my benefits to be reinstated (from the point of Seniority Date)

7) I expect my CMS Grades (all and every single one of them—I have the copies) to be reinstated as they were, most of them Grade A/SP and the remainder, only a small few, Grade B/SP

8) I expect above-average compensatory damages considering that I have been adversely affected; and for a great length of time and at great harm to me, I have been placed in and have been through an very unorthodox and fantastic ordeal of dealing with deceitful act after deceitful act of manipulation, fraud, including Intentional/Negligent Misrepresentation, cover-ups, etc. toward/to me, an Illinois, tax-paying citizen, and an Illinois disability customer (DHS, CMS SDO) – I have been unemployed since the actions of unlawful suspension followed by unlawful termination by DHS thereby rendering me homeless since these unlawful actions against me, a disabled citizen, were perpetrated

9) As a result of Intentional Misconduct, I expect Unlimited Liability in the form of Punitive Damages and in Exemplary Damages (for the same reasons as stated in #8, this Pleading, & relevant documents)

10) I expect for all such pecuniary losses to be paid in full


11) I expect to be paid as an attorney for all of my legal work in/throughout this entire ordeal from beginning – 03-2015 DHS/DDD H. R. breaches in law that included the H. R. Director, Mr. R. Booker – to upon said date of conclusion of these matters. I will strongly consider being paid at the highest Paralegal fee per hour and/or at the highest Paralegal salary within the Downtown Chicago region. I did legal work

12) If I procure attorney representation, I expect full compensation to the attorney/law firm for services

13) I expect fair, equal, lawful, unbiased, objective treatment within State of Illinois (and USA) in employment, public accommodations, including state-funded colleges (private as well), etc. and by/from/through police, in all levels and aspects, local, State, and Federal government in all aspects, and politicians at all levels and in all aspects of politics.

14) I expect for State and Federal Government, particularly, Civil/Human Right-Upholding agencies/offices/departments/commissions, to PROTECT, DEFEND, and UPHOLD/ENFORCE LAW, especially if and when it means NOT DECEIVING to COVER UP for, PROTECT, and KEEP “OFF THE BOOKS” BIG BUSINESS, POLITICIANS, Police and GOVERNMENT.

LETRA BLEDSOE, Plaintiff

BY:  08/30/16

LETRA BLEDSOE, Pro Se

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Bledsoe

Plaintiff's name (print clearly or type): LETRA BLEDSOE

Plaintiff's mailing address: P. O. Box 357

City Streamwood State IL ZIP 60107

Plaintiff's telephone number: ( )

Plaintiff's email address (if you prefer to be contacted by email):

15. Plaintiff has previously filed a case in this district. ☐ Yes ☐ No

*If yes, please list the cases below.*

*Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.*